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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 10783192 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10783192 (the "10783192 Patent"). After preliminary review, we have substantial concerns about the validity, enforceability, and scope of the asserted claims, summarized below. We reserve all rights and defenses.

## **1. Subject Patent — Summary**

A review of US Patent 10,783,192 and a search of the United States Patent and Trademark Office (USPTO) database and the 2026 dockets of the U.S. Court of Appeals for the Federal Circuit (CAFC) provides the following summary.

Patent Details for US 10,783,192

- Title: System, method, and user interface for a search engine based on multi-document summarization
- Assignee: The patent is assigned to an "Individual."
- Inventor: Dmitri Soubbotin
- Filing Date: December 4, 2015
- Issue Date: September 22, 2020
- Abstract: The patent describes a method for a computer system to search multiple documents. A user's query is sent to a system core, which passes it to a search component. The search...

## **2. Validity Concerns under 35 U.S.C. § 102 — Prior Art**

We have identified prior-art references that, in our preliminary view, anticipate one or more asserted claims of the 10783192 Patent:

Prior Art Analysis for U.S. Patent No. 10,783,192

A detailed review of the prior art cited in U.S. Patent No. 10,783,192, "System, method, and user interface for a search engine based on multi-document summarization," reveals several key patents and publications that were considered by the USPTO during the examination process. This analysis outlines these references and their potential relevance to the claims of the '192 patent. The claims of the '192 patent generally revolve around a system and method for receiving a search query, obtaining a set of search results, generating a multi-document summary from a subset of these results, and presenting this summary to the user, often with interactive features allowing for refinement.

Below are the most relevant prior art references and an analysis of which claims they might anticipate, in whole or in part, under 35 U.S.C. § 102. This analysis is for informational purposes and does not constitute a legal opinion on the validity of any claim.

Cited U.S. Patent Documents

- U.S. Patent No. 6,658,423 B1

Title: System and method for...

#### 4. Litigation History of the Patent

Public records reflect that the 10783192 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Semantic Engines LLC v. Microsoft Corp — 2:26-cv-00339 · Texas Eastern District Court · filed 2026-04-23 · Open

#### 4. Request

In light of the foregoing, we request that your client (i) provide a detailed claim chart identifying each accused product or service and mapping every limitation of each asserted claim, (ii) identify any prior art known to your client, including any references cited during prosecution or reexamination, and (iii) substantiate the basis for any damages or licensing demand. We are prepared to discuss the matter further once we have received and reviewed the foregoing.

Sincerely,

[Your Name]

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