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[Your Name]
[Your Title]
[Your Company]
[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]
[Firm Name]
[Address]

Re: U.S. Patent No. 10944400 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10944400 (the "10944400 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

US patent 10944400, titled "On-die termination control," was issued on March 9, 2021, from an application filed on April 20, 2020 (Application No. US16/853,658). The original assignee was Rambus Inc, and the current assignee, as of October 15, 2025, is Signal LLP. The inventors are Kyung Suk Oh and Ian P. Shaeffer.
Abstract:
The patent describes a memory control component that manages on-die termination (ODT) in a memory IC during write operations. Specifically, the memory control component outputs a memory write command and associated write data to a memory IC. Before the write data is received by the memory IC, the control component asserts a termination control signal. This signal…

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 10944400 Patent:

Most Relevant Prior Art for US Patent 10944400
US Patent 10944400's earliest priority date is June 2, 2006. Therefore, the following analysis focuses on prior art citations with a priority or publication date predating June 2, 2006, that

appear most relevant to the patent's independent claims (Claims 1, 11, and 20). The core innovation of US10944400 is applying a first on-die termination impedance during write-data reception and a second, different on-die termination impedance after write-data reception, controlled by commands that cause control values to be stored in registers within the DRAM. Below are selected prior art references from the patent's citation list that potentially anticipate aspects of US10944400, along with their details and potential anticipatory relevance.
1. US20050007835A1: Integrated circuit memory devices that support selective mode register set commands and related memory modules, memory controllers, and methods
• Full Citation: US20050007835A1, "Integrated circuit memory devices that support selective mode register set commands and related memory…

3. Obviousness under 35 U.S.C. § 103

Independent of § 102, we believe the asserted claims are obvious in view of combinations of prior art that a person having ordinary skill in the art would have been motivated to combine:

Obviousness Analysis under 35 U.S.C. § 103 for US Patent 10944400
The independent claims of US Patent 10944400 (Claims 1, 11, and 20) describe an integrated circuit device (e.g., a memory controller) and a corresponding method. The core invention lies in transmitting commands to a Dynamic Random Access Memory (DRAM) component to configure it to apply a first on-die termination (ODT) impedance during a write-data reception interval and a second, different ODT impedance after the write-data reception interval has transpired. The first impedance is typically higher (lower load, "soft termination") than the second impedance (higher load, "hard termination") as per dependent claim 10 and the patent's description.
A person having ordinary skill in the art (PHOSITA) in high-speed signaling systems and memory design would have found the claimed invention obvious due to the combination of known prior art references, driven by the motivation to improve signal integrity and minimize reflections in high-speed memory interfaces.
Combination of Prior Art References
The following combination…

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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