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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. 10965425 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10965425 (the "10965425 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

Following a review of public records and the patent documentation for U.S. Patent No. 10,965,425, here is a summary of its key details and an analysis of its independent claims. Patent Information:

- Title: Control information for multi-user transmissions in WLAN systems
- Current Assignee: Atlas Global Technologies LLC
- Inventors: Yujin Noh, Daewon Lee, Sungho Moon, Young Hoon Kwon
- Filing Date: June 21, 2019
- Issue Date: March 30, 2021
- Abstract: In wireless communications for multi-users, an access point may generate a first frame for allocating resources to a plurality of stations. The first frame may contain an indication as to whether a station(s) is allocated at least one of a...

4. Litigation History of the Patent

Public records reflect that the 10965425 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Atlas Global Technologies LLC v. Walmart Inc — 2:26-cv-00317 · Texas Eastern District Court · filed 2026-04-21 · Open

• Atlas Global Technologies LLC v. TP-Link Corporation Limited et al. — 2:25-cv-00534 · U.S. District Court for the Eastern District of Texas · active

3. 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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