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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. 10979693 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10979693 (the "10979693 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

Analysis of U.S. Patent 10,979,693: A Stereoscopic 3D Camera for Virtual Reality
Washington D.C. - A detailed analysis of U.S. Patent No. 10,979,693, titled "Stereoscopic 3D camera for virtual reality experience," reveals a method for enhancing virtual reality by capturing and processing three-dimensional video. The patent, issued on April 13, 2021, is assigned to Artificial Intelligence Imaging Association Inc.

The invention, credited to inventors Han Xiong Jin and Adam Rowell, was filed on February 28, 2018. It addresses the growing demand for immersive virtual reality content by outlining a system and method for capturing, correcting, and presenting stereoscopic video.

The abstract of...

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 10979693 Patent:

Analysis of Prior Art for U.S. Patent 10,979,693

A detailed review of the prior art cited during the examination of U.S. Patent 10,979,693, "Stereoscopic 3D camera for virtual reality experience," provides insight into the novelty of the invention. The following analysis details the most relevant references and their potential impact

on the patent's claims under 35 U.S.C. § 102, which pertains to anticipation by prior art. The references are those listed in the patent's file wrapper as considered by the USPTO examiner.

Key Prior Art and its Relation to the Claims:

The core of patent 10,979,693 lies in its method for stabilizing stereoscopic video by identifying a reference frame, analyzing motion in preceding and succeeding frames, and using a series of matrix calculations to create a modified, stabilized frame. This process involves calculating matrices for motion, for mapping from 3D to 2D space absent of motion, and an inverse matrix, then applying them in a combined operation.

1. US Patent Application Publication No. US 2011/0141349 A1

• Full Citation: US 2011/0141349...

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 of U.S. Patent 10,979,693 under 35 U.S.C. § 103

This analysis evaluates whether the independent claims of U.S. Patent 10,979,693 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention, based on the prior art references cited during the patent's examination. The standard for obviousness under 35 U.S.C. § 103 is whether the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious to a PHOSITA.

A PHOSITA in this context would be an engineer or computer scientist with a bachelor's degree in a relevant field and several years of experience in computer vision, image processing, and software development, particularly in the areas of stereoscopic video and virtual reality.

The central argument for obviousness rests on the combination of two key prior art references: US 2011/0141349 A1 (Albuz) and US 2013/0124471 A1 (Chen). A PHOSITA, faced with the well-known problem of stabilizing stereoscopic video for VR applications to reduce user discomfort...

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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