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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. 10980926 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 10980926 (the "10980926 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 concise summary of US Patent 10,980,926, including litigation activity, is provided below.
Summary of US Patent 10,980,926
Title: System and method for collecting plasma
Assignee: Haemonetics Corp.
Inventor: Michael Ragusa
Filing Date: May 4, 2020
Issue Date: April 20, 2021
Abstract: The patent describes a method for collecting plasma that involves determining a donor's weight and hematocrit. Blood is withdrawn from the donor and mixed with an anticoagulant before being separated into plasma and other components. The system calculates the percentage of anticoagulant in the collected plasma and the volume of "pure plasma." The collection process continues until a target volume 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 10980926 Patent:

Based on a technical analysis of US patent 10,980,926 and its cited references, the most

relevant prior art aims to automate and optimize the apheresis process by using donor-specific information. The core invention of the '926 patent is a method and system that calculates the volume of pure plasma by accounting for the volume of anticoagulant mixed into the final collected product, using the donor's hematocrit to make this calculation. The collection process is then stopped when a target volume of pure plasma is achieved, rather than a target volume of the total plasma-anticoagulant mixture.
The following cited patents are identified as the most relevant prior art.
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1. US Patent 5,437,598 A
• Full Citation: US Patent 5,437,598, "Automation of plasma sequestration," assigned to Cobe Laboratories, Inc.
• Publication Date: August 1, 1995 (Filed: January 21, 1994)
• Description: This patent describes an automated apheresis system that uses donor-specific data to calculate parameters for the collection procedure. A controller receives donor data, including height, weight, sex,…

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 US Patent 10,980,926
This analysis evaluates the obviousness of the independent claims of US Patent 10,980,926 (the '"926 patent") under 35 U.S.C. § 103. The analysis is based on prior art references cited by the patent itself. The priority date of the '926 patent is May 30, 2017.
A claim is considered obvious if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). A PHOSITA in this field would likely be an individual with a degree in biomedical or mechanical engineering and several years of experience in the design and operation of apheresis systems.
The central concept of the '926 patent is to use a donor's weight and hematocrit to pre-calculate a target collection volume that accounts for both the desired amount of pure plasma and the co-collected anticoagulant, thereby ensuring a more precise and standardized volume of pure plasma is collected from every donor.
Prior Art Combination…

4. Litigation History of the Patent

Public records reflect that the 10980926 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Haemonetics Corporation v. Terumo BCT, Inc. — 1:25-cv-01409 · United States District Court for the District of Colorado · filed 2025-05-05 · Ongoing

5. 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]