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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. 11076735 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11076735 (the "11076735 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 comprehensive analysis of United States Patent 11,076,735 reveals a detailed invention related to a "Surface cleaning apparatus," assigned to Bissell Inc. The patent has been the subject of recent legal proceedings, culminating in a decision by the U.S. Court of Appeals for the Federal Circuit.

Patent Details:

- Title: Surface cleaning apparatus
- Assignee: Bissell Inc.
- Inventors: Jacob Resch, Jacob S. Boles
- Filing Date: September 10, 2020
- Issue Date: August 3, 2021
- Abstract: The patent describes a surface cleaning apparatus that includes a storage tray for a self-cleaning mode and for drying a brushroll. A key feature is that the self-cleaning mode can only be activated when...

## **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 11076735 Patent:

## Prior Art Analysis for U.S. Patent 11,076,735

Here is an analysis of the most relevant prior art cited during the prosecution of U.S. Patent 11,076,735. The key inventive concept of the patent, as defined in independent claims 1 and 13, is a surface cleaning system where the apparatus, when docked on a cleaning and charging tray, will disable the battery charging circuit while it performs an automatic self-cleaning "cleanout cycle." For a prior art reference to anticipate a claim under 35 U.S.C. § 102, it must disclose every element of that claim in a single document.

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1. U.S. Patent Application Publication No. US 2018/0344070 A1

- Full Citation: US 2018/0344070 A1; Stoll, et al. (Assignee: Kärcher).
- Publication Date: December 6, 2018 (Filed: May 30, 2018).
- Brief Description: This document describes a wet-cleaning device with a base station. The base station is designed to receive the cleaning device for storage and also for performing a cleaning process on the device's cleaning roller. The base station includes a flushing fluid tank and a suction device to draw the dirty...

### 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 11,076,735 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in U.S. Patent 11,076,735 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made. A PHOSITA in this context would be an engineer or product designer with experience in floor care appliances, particularly in the design of battery-powered devices, electrical power management systems, and embedded controls.

The core inventive concept, as defined by independent claims 1 and 13, is a surface cleaning system with a docking station that performs an automated self-cleaning cycle, during which the battery charging function is disabled. The analysis below combines prior art references to argue that this concept would have been an obvious design choice.

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Primary Obviousness Combination: US 2018/0344070 (Stoll) in view of General Engineering Principles of Power Management

1. Base Reference: US 2018/0344070 A1 (Stoll)

- What Stoll Discloses: Stoll is the most relevant prior art as it teaches a system that...

### 4. Litigation History of the Patent

Public records reflect that the 11076735 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Bissell Inc. v. International Trade Commission — 24-1509 · Court of Appeals for the Federal Circuit · Decided
- Bissell Inc. v. Tineco Intelligent Technology Co., Ltd. — 337-TA-1304 · International Trade Commission · Decided
- Bissell Inc. v. Multiple parties — 337-TA-3601 · International Trade Commission · Filed

## 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]

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