

**SAMPLE — NOT LEGAL ADVICE.** This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[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. 11080001 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11080001 (the "11080001 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**

{"answer":"Here is a summary of U.S. Patent 11,080,001.

Title: Concurrent transmission and playback of audio information

Assignee: Sonos Inc

Inventors: Nicholas A. J. Millington

Filing Date: April 17, 2013

Issue Date: August 3, 2021

Abstract:

A system for synchronizing operations among a plurality of devices that have independent clocking arrangements. The system includes a task distribution device that sends tasks to a synchrony group of devices that are to perform the tasks in unison. The task distribution device assigns each task with a time stamp that indicates a time, relative to a clock maintained by the task distribution device, at which the members of the synchrony group are...

## **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 11080001 Patent:

{"answer":"### Prior Art Analysis for U.S. Patent 11,080,001

An analysis of the prior art cited during the prosecution of U.S. Patent 11,080,001 reveals several key patents and applications that were considered by the USPTO examiner. This analysis outlines the most relevant of these, detailing their disclosures and their potential impact on the patentability of the claims in the '001 patent under 35 U.S.C. § 102.

Key Prior Art and Potential Anticipation of Claims:

1. U.S. Patent No. 7,571,014 B1 (the '014 patent)

- Full Citation: US 7,571,014 B1, "Method and apparatus for operating a media system," filed by B. Lambourne, et al.

- Publication Date: August 4, 2009 (Filed: June 30, 2003)

- Brief Description: The '014 patent describes a system for controlling a plurality of media rendering devices from a single remote control. The system allows users to group devices into zones and control them simultaneously. This includes synchronizing playback across multiple devices. The patent details a "zone scene" which is a stored configuration of zones and their operational parameters.

- ...

### **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 11,080,001

An analysis of U.S. Patent 11,080,001 ("the '001 patent") and publicly available prior art indicates that the claims may be vulnerable to an obviousness challenge under 35 U.S.C. § 103. This analysis is based on a combination of prior art references that, when considered together, would have motivated a Person of Ordinary Skill in the Art (POSA) to arrive at the claimed invention.

A POSA at the time of the invention would have had a background in computer science or electrical engineering, with specific experience in networked systems, audio processing, and software development for embedded systems.

Summary of Key Patent Claims

The independent claims of the '001 patent (claims 1, 13, and 14) are directed towards a method, a non-transitory computer-readable medium, and a playback device, respectively, for transferring the role of a "master device" to a "slave device" within a synchrony group of networked media players. The core of this inventive concept involves the master device sending a message to a designated slave device. This...

### **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]

**DISCLAIMER.** This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.

*Generated May 14, 2026 by [ihatepatenttrols.com](http://ihatepatenttrols.com) — sample only.*