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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. 11100163 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11100163 (the "11100163 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

Summary of U.S. Patent 11,100,163

Title: Photographic memory

Assignee: Mimzi LLC

Inventor: James L. Geer

Filing Date: November 29, 2018

Issue Date: August 24, 2021

Abstract: A system and method for collecting data may include a data collection device to obtain the data from a user, an apparatus for obtaining metadata for each word of the data from the user, an apparatus for obtaining a searchable transcript of the data and a device to store the searchable transcript. The metadata may be date data, time data, name data or location data and the data collection device may include a speech recognition engine to translate speech into searchable words. The speech recognition engine may...

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 11100163 Patent:

Prior Art Analysis for U.S. Patent 11,100,163

An analysis of the prior art cited during the examination of U.S. Patent 11,100,163, titled "Photographic memory," reveals several key patents and patent applications that were considered relevant to the claims. This analysis outlines the most pertinent of these references, their core teachings, and their potential impact on the patentability of the claims under 35 U.S.C. § 102 for anticipation. The priority date of the '163 patent is July 29, 2008.

U.S. Patent 7,031,728 B2

- Full Citation: US 7,031,728 B2
- Publication Date: April 18, 2006
- Filing Date: March 1, 2002
- Brief Description: This patent discloses a system and method for providing location-based services to mobile users. It describes a location-based advertising system where advertisements are delivered to mobile devices based on their geographical location. The system can also consider user preferences and other contextual information to deliver more relevant advertisements.
- Potential Anticipation of Claims: This reference is particularly relevant to the independent...

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 11,100,163

Prepared by: Senior U.S. Patent Analyst

Date: May 9, 2026

I. Introduction

This analysis examines the patentability of the claims of U.S. Patent No. 11,100,163 ('163 patent) under 35 U.S.C. § 103, which pertains to the non-obviousness requirement for patentability. An invention is considered obvious if the differences between the claimed invention and the prior art are such that the invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (a "POSITA"). This analysis will consider combinations of prior art references to determine if they would render the claims of the '163 patent obvious.

The '163 patent, titled "Photographic memory," filed on November 29, 2018, generally discloses a system and method for capturing audio and other data, creating a searchable transcript, and associating it with metadata such as time and location. A key aspect of the invention, as detailed in the independent claims, involves presenting location-based advertisements to a mobile device...

4. Litigation History of the Patent

Public records reflect that the 11100163 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Mimzi, LLC v. Honda Motor Co., Ltd. — U.S. District Court for the Eastern District of Texas · dismissed
- Mimzi, LLC v. Nissan Motor Co., Ltd. — 2:25-cv-00601 · U.S. District Court for the Eastern District of Texas · filed 2025-06-04 · active

• Mimzi, LLC v. Samsung Electronics Co., Ltd. — 2:23-cv-00238 · U.S. District Court for the Eastern District of Texas · 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]

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