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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. 11121222 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11121222 (the "11121222 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 detailed analysis of U.S. Patent 11,121,222 reveals a focus on enhancing semiconductor performance by manipulating dopant concentrations. Below is a summary of the patent's key details and a simplified explanation of its independent claims. A search of the CAFC 2026 dockets for this patent number yielded no results.

Summary of U.S. Patent 11,121,222

Title: Semiconductor devices with graded dopant regions

Assignee: GREENTHREAD LLC

Inventor: G.R. Mohan Rao

Filing Date: July 27, 2020

Issue Date: September 14, 2021

Abstract:

Most semiconductor devices manufactured today have uniform dopant concentration, either in the lateral or vertical device active (and isolation) regions. By...

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 11121222 Patent:

Analysis of Prior Art Cited in U.S. Patent 11,121,222

An analysis of the prior art cited during the examination of U.S. Patent 11,121,222, "Semiconductor devices with graded dopant regions," provides insight into the patent landscape at the time of invention and the specific documents considered by the USPTO examiner. Under 35 U.S.C. § 102, a patent claim is anticipated if every element and limitation of the claim is found, either explicitly or inherently, in a single prior art reference. The following is an evaluation of the most relevant cited references and their potential to anticipate the independent claims of the '222 patent.

Key Cited Prior Art References

The following patents and patent applications were cited by the examiner and are considered relevant to the core concepts of the '222 patent.

1. U.S. Patent No. 6,310,366 B1

- Full Citation: Rhodes, Howard E. Retrograde well structure for a CMOS imager. Micron Technology, Inc., assignee. 30 Oct. 2001.
- Filing Date: June 16, 1999.
- Brief Description: This patent describes a CMOS active pixel sensor that utilizes a...

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:

An analysis of US patent 11,121,222 in light of the cited prior art suggests that its claims would have been obvious to a person of ordinary skill in the art (POSA) at the time of the invention, with a priority date of September 3, 2004.

Definition of a Person of Ordinary Skill in the Art (POSA)

A person of ordinary skill in the art (POSA) for this patent would be an individual with a Bachelor's or Master's degree in Electrical Engineering or a related field like Physics. This person would have several years of practical experience in the design and fabrication of semiconductor devices, including knowledge of device physics, ion implantation, epitaxial growth, and the common challenges in VLSI, CMOS, DRAM, and power device technologies circa 2004. A POSA would be familiar with the effects of dopant profiles on carrier transport and device performance.

Obviousness Analysis of Claims

The core inventive concept of the '222 patent is the use of graded dopant concentrations to create a built-in electric drift field. This field is engineered to actively sweep unwanted charge carriers...

4. Litigation History of the Patent

Public records reflect that the 11121222 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Greenthread Ltd v. Monolithic Power Systems Inc — 26-1723 · Court of Appeals for the Federal Circuit · filed 2026-04-22 · Open
- Greenthread, LLC v. Intel Corporation et al. — 6:22-cv-00105 · U.S. District Court for the Western District of Texas · filed 2022-01-27 · Active

- Greenthread, LLC v. NXP USA, Inc. — 6:22-cv-01293 · U.S. District Court for the Western District of Texas · Related to other actions
- Greenthread, LLC v. General Motors Company — 1:23-cv-00369 · U.S. District Court for the Western District of Texas · Active
- Greenthread, LLC v. Continental Automotive Systems, Inc. — 1:23-cv-00326 · U.S. District Court for the District of Delaware · Related to other actions
- Greenthread, LLC v. Robert Bosch LLC — 1:23-cv-00333 · U.S. District Court for the District of Delaware · Related to other actions
- Greenthread, LLC v. ON Semiconductor Corporation et al. — 1:23-cv-00443 · U.S. District Court for the District of Delaware · filed 2023-04-21 · Administratively closed
- Greenthread, LLC v. Monolithic Power Systems, Inc. — 1:23-cv-00579 · U.S. District Court for the District of Delaware · filed 2023-05-26 · Related to IPR
- ...and 3 additional case(s)

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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