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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. 11123331 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11123331 (the "11123331 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 11,123,331 is as follows:
Title: Tacrolimus for improved treatment of transplant patients
Assignee: Veloxis Pharmaceuticals, Inc.
Inventors: Robert D. Gordon, Per Holm, Anne-Marie Lademann, Tomas Norling
Filing Date: October 30, 2020
Issue Date: September 21, 2021
Abstract:
The patent describes an extended-release oral dosage form of tacrolimus, or a similar active compound, designed for once-daily use in immunosuppressive therapy for patients, particularly those who have received kidney or liver transplants. This formulation is designed to release the drug over a prolonged period, which leads to high bioavailability and a better pharmacokinetic profile…

## 4. Litigation History of the Patent

Public records reflect that the 11123331 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Veloxis Pharmaceuticals AS v. Zydus Cadila et al. — 1:26-cv-00467 · Delaware District Court ·

filed 2026-04-23 · Open

## 3. 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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