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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. 11200252 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11200252 (the "11200252 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 11,200,252

A concise summary of U.S. Patent 11,200,252 is provided below, including its title, assignee, inventors, key dates, abstract, a plain-language overview of its independent claims, and a note on its legal status.

Title: Process and apparatus for selecting an item from a database

Assignee: Kannuu Pty Ltd

Inventor: Kevin W. Dinn

Filing Date: July 13, 2020

Issue Date: December 14, 2021

Abstract:

The patent describes a method and system for quickly selecting items from a database, particularly on devices with limited input capabilities. The invention, referred to as "partial word completion," analyzes the identifiers of all items in a collection to...

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 11200252 Patent:

Prior Art Analysis for U.S. Patent 11,200,252

An analysis of the prior art cited during the prosecution of U.S. Patent 11,200,252 reveals several key references that were considered by the USPTO examiner. These references are crucial in understanding the patented invention's scope and the technological landscape at the time of the invention. Under 35 U.S.C. § 102, a patent claim is anticipated if a single prior art reference discloses each and every element of the claim.

The following is a review of the most relevant prior art cited against the '252 patent, with an analysis of the claims each reference could potentially anticipate.

1. U.S. Patent No. 7,496,841 (Re-issued as RE43,622)

- Full Citation: US Patent No. 7,496,841, filed August 26, 2004, and issued February 24, 2009. Re-issued as RE43,622 on August 28, 2012. Titled "Method and apparatus for text input."

Assignee: Tegic Communications, Inc.

- Brief Description: This patent, commonly known as '841, discloses a method for text input on devices with limited keyboards, such as mobile phones. It describes a predictive...

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 11,200,252

This analysis examines whether the claims of U.S. Patent 11,200,252 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made, in light of prior art existing before the priority date of January 3, 2007. The analysis is conducted under 35 U.S.C. § 103.

1. The Legal Standard for Obviousness

Under 35 U.S.C. § 103, a patent claim is invalid "if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art."

The Supreme Court's decision in *KSR Int'l Co. v. Teleflex Inc.* established a flexible framework for this analysis, considering factors such as the scope and content of the prior art, the differences between the prior art and the claims, and the level of ordinary skill in the art. A key inquiry is whether a PHOSITA would have had a reason or motivation to combine the teachings of prior art references to arrive at...

4. Litigation History of the Patent

Public records reflect that the 11200252 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- *Kannuu Pty Ltd. v. Samsung Electronics Co., Ltd. et al.* — 1:19-cv-04297-ER · U.S. District Court for the Southern District of New York · filed 2019-05-10 · 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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