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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 11222349 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11222349 (the "11222349 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

The patent details are extracted from the provided text.

The CAFC 2026 docket search results indicate general information about CAFC case information and PACER, but no specific dockets for patent US11222349 in 2026. I explicitly searched for "CAFC dockets US11222349 2026" and did not find relevant results. The search results mainly link to the main pages for case information and search systems (PACER, UJS Portal). One result mentioned "2026 Dockets" but it was for Oklahoma.gov, not CAFC.

Therefore, I can conclude there's no publicly available CAFC docket information for US11222349 in 2026 based on the provided search.

Here's the summary:

Summary of US Patent 11222349

- Title:...

## 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 11222349 Patent:

The USPTO provides a Patent Public Search tool that allows users to search for patents and patent application publications. To identify the most relevant prior art for US Patent 11222349, I

will access the patent information directly from the USPTO database.

Most Relevant Prior Art for US Patent 11222349

To provide a comprehensive analysis of the most relevant prior art, I would typically need to perform a detailed search within the USPTO database for US11222349 and then review the "References Cited" section of the patent. Since I do not have direct, real-time access to perform this live search and retrieve the full list of cited references with their details, I will rely on the provided patent text to identify any explicitly mentioned prior art or related applications.

The patent document itself mentions several related applications and previous works in its "PRIORITY CLAIM" and "DESCRIPTION" sections, which often serve as important prior art. Additionally, the claims themselves are judged against prior art to determine their patentability under 35 U.S.C. § 102 (novelty) and §...

### **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 US Patent 11222349 Under 35 U.S.C. § 103

This analysis evaluates the obviousness of US Patent 11222349, "Discovering neighborhood clusters and uses therefor," under 35 U.S.C. § 103, considering prior art available before the patent's priority date of August 30, 2012. The analysis focuses on the independent claims (Claims 1, 13, and 18) and identifies combinations of prior art references that would render these claims obvious to a person having ordinary skill in the art (PHOSITA).

Independent Claims Overview

The independent claims of US Patent 11222349 center on a computer-based system and method for discovering geographic clusters of venues using venue check-in data. Key aspects include:

- Claim 1 (System): A system with a database storing venue check-in data. Processors are programmed to generate a check-in intensity vector for each venue, then a pairwise venue similarity matrix where similarity scores are based on both geographical distance and social distance (determined by common venue visitors). Finally, the system identifies geographic clusters...

### **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]**

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