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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. 11251394 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11251394 (the "11251394 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**

I'm sorry, but I was unable to find any information about US Patent 11251394 using the available search tools. This could be because the patent number is incorrect, or the information is not yet publicly available in the databases I can access.

I was also unable to find any relevant information in the CAFC 2026 dockets.

To get the information you need, I would recommend double-checking the patent number and searching for it directly on the USPTO's official website or other specialized patent databases.

## **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 11251394 Patent:

I am sorry, but I was unable to find the specific information for US Patent 11,251,394 in the publicly available databases. This could be due to a few reasons: the patent number might be incorrect, it could be a recently issued patent and the data has not been fully indexed by all public search tools yet, or there might be a typographical error in the number provided.

To conduct a thorough prior art search, it is crucial to have the correct patent number and access to its full documentation, including the claims and the list of cited references.

However, I can provide a general methodology and an example of how a prior art analysis would

be conducted if the patent information were available. This will help you understand the process and what to look for when you obtain the correct patent document.

#### General Methodology for Prior Art Analysis

A prior art search for a patent like US 11,251,394, which deals with an "Organic light emitting display and method of fabricating the same," would typically involve the following steps:

1. Understand the Invention: The first step is to...

### **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:

Analysis of Obviousness for U.S. Patent No. 11,251,394

An analysis of U.S. Patent No. 11,251,394 ("the '394 patent") in light of publicly available prior art indicates that its claims may be vulnerable to an obviousness challenge under 35 U.S.C. § 103. The core concept of the '394 patent, which involves integrating touch-sensitive electrodes within the encapsulation layers of an Organic Light Emitting Diode (OLED) display, appears to be a predictable combination of known elements in the art.

Key Claim of the '394 Patent:

The '394 patent claims an organic light emitting display that includes:

- Light-emitting elements on a substrate.
- An encapsulation unit on the light-emitting elements, comprising multiple inorganic layers and at least one organic layer between them.
- Touch sensing lines and touch driving lines that intersect, with at least one of the encapsulation layers acting as the dielectric insulator between them.

Prior Art Analysis and Obviousness Combinations:

A person of ordinary skill in the art of display technology at the time of the invention would have been...

### **4. Litigation History of the Patent**

Public records reflect that the 11251394 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- LG Display Co., Ltd. v. Tianma Microelectronics Co., Ltd. et al. — 5:25-cv-00078 · U.S. District Court for the Eastern District of Texas · filed 2025-06-13 · open
- Tianma Microelectronics Co., Ltd. v. LG Display Co., Ltd. — IPR2025-01579 · United States Patent and Trademark Office, Patent Trial and Appeal Board · Institution Denied

### **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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