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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. 11301880 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11301880 (the "11301880 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 11,301,880

This report provides a concise summary of U.S. Patent 11,301,880, including its title, assignee, inventors, key dates, abstract, and a plain-language overview of its independent claims. The patent is currently active and has been the subject of multiple patent infringement lawsuits.

Title: Method and system for inventory management in a retail store

Assignee: The current assignee is listed as Alpha Modus Corp.

Inventors: Michael Garel, Jim Wang

Filing Date: April 1, 2020

Issue Date: April 12, 2022

Abstract:

The patent describes systems and methods for monitoring and analyzing consumer behavior in various settings, particularly in retail environments....

4. Litigation History of the Patent

Public records reflect that the 11301880 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Alpha Modus Corp v. Circle K Stores Inc — 2:26-cv-00335 · Texas Eastern District Court · filed

2026-04-23 · Open

- Alpha Modus Corp. v. Mood Media, LLC — 2:24-cv-00918 · U.S. District Court for the Eastern District of Texas · filed 2024-09-25 · Dismissed
- Alpha Modus Corp. v. V-Count — 2:24-cv-00919 · U.S. District Court for the Eastern District of Texas · filed 2024-09-25 · Active
- Alpha Modus Corp. v. Lowe's Companies, Inc. — 2:24-cv-01056 · U.S. District Court for the Eastern District of Texas · filed 2024-11-06 · Active
- Alpha Modus Corp. v. H&M Hennes & Mauritz LP — 2:25-cv-00868 · U.S. District Court for the Eastern District of Texas · filed 2025-01-01 · Active
- Alpha Modus Corp. v. Zara USA Inc. — 2:25-cv-00923 · U.S. District Court for the Eastern District of Texas · filed 2025-01-08 · Active
- Alpha Modus Corp. v. Foot Locker, Inc. — 2:25-cv-00931 · U.S. District Court for the Eastern District of Texas · filed 2025-01-09 · Active
- Alpha Modus Corp. v. Wakefern Food Corp. — 2:25-cv-00947 · U.S. District Court for the Eastern District of Texas · filed 2025-01-11 · Dismissed
- ...and 7 additional case(s)

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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