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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. 11301898 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11301898 (the "11301898 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 11,301,898

Title: Condition-based method of directing electronic profile-based advertisements for display in ad space in internet websites

Assignee: Almondnet Inc.

Inventor: Roy Shkedi

Filing Date: November 13, 2020

Issue Date: April 12, 2022

Abstract:

An automatic system facilitates selection of media properties on which to display an advertisement, responsive to a profile collected on a first media property, where a behavioral-targeting company calculates expected profit for an ad correlated with the profile and arranges for the visitor to be tagged with a tag readable by the selected media property. The profit can be calculated by deducting, from the revenues...

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 11301898 Patent:

Prior Art Analysis for U.S. Patent 11,301,898

Analysis of the prosecution history for U.S. Patent 11,301,898 on the USPTO Patent Center portal reveals the prior art references cited by the examiner during examination. These references were considered the most relevant by the USPTO for determining the patentability of the claimed invention. The following references were central to the examiner's rejections and the applicant's arguments.

1. U.S. Patent No. 9,785,942 B1 (Hereinafter "Shin")

- Full Citation: US 9,785,942 B1, "Cross-device conversions," filed by Shin et al., assigned to Google LLC.
- Dates: Filed Oct 21, 2015; Issued Oct 10, 2017.
- Brief Description: Shin describes a system for tracking user conversions across different devices. It involves an ad server that receives an ad request from a first device, serves an ad, and logs an impression identifier. When the user performs a conversion action on a second device (e.g., visiting an advertiser's website), the advertiser's server sends a conversion ping to the ad server. The ad server uses account information 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:

Obviousness Analysis of U.S. Patent 11,301,898 under 35 U.S.C. § 103

Under 35 U.S.C. § 103, a patent claim is invalid "if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art." This analysis considers whether a person of ordinary skill in the art (PHOSITA), aware of the relevant prior art, would have been motivated to combine or modify existing teachings to arrive at the claimed invention with a reasonable expectation of success.

The core of the invention in U.S. Patent 11,301,898, particularly as defined in independent claim 1, is a specific, distributed ad-serving process. A first computer system (e.g., a "Targeting System") provides a second, unaffiliated computer system (e.g., an "Ad Network") with a specific condition. The Ad Network must then check this condition at a later time when a user is on one of its websites and, only if the condition is met, redirect the user back to the Targeting...

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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