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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. 11327669 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11327669 (the "11327669 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

Analysis of U.S. Patent No. 11,327,669 and Associated Litigation

Date of Analysis: April 26, 2026

An analysis of United States Patent number 11,327,669 reveals a technology focused on providing configurable, policy-based behavior for data storage devices. The patent, assigned to Gaea LLC, details a system and method for allowing greater user control over how data is stored and managed on a physical level.

Bibliographic Information:

- Title: Data storage device with configurable policy-based storage device behavior
- Assignee: Gaea LLC
- Inventors: Joshua Johnson, Curt Bruner, Jeffrey Reh, Christopher Squires, Brian Wilson
- Filing Date: August 11, 2020
- Issue Date: May 10, 2022
- ...

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 11327669 Patent:

Analysis of Prior Art for U.S. Patent No. 11,327,669

This analysis details the prior art cited during the prosecution of U.S. Patent No. 11,327,669. Each cited reference is evaluated for its potential to anticipate the independent claims of the '669 patent under 35 U.S.C. § 102. The core invention of the '669 patent involves a data storage device with a controller that can be configured by a "storage device policy" to manage the trade-off between storage reliability and capacity.

I. U.S. Patent No. 9,665,463 B2

- Full Citation: Tadayon, Bijan, et al. System and Method for Optimizing Non-Volatile Memory Based Storage System Performance by Modifying Data Placement Policies Based on Workload Characteristics. U.S. Patent 9,665,463 B2, issued May 30, 2017. (Filed Jan. 21, 2014).
- Assignee: FADU, Inc.
- Brief Description: This patent describes a system for managing a solid-state drive (SSD) where the data placement policy is dynamically adjusted based on the characteristics of the I/O workload. It aims to optimize performance by altering how and where data is written to the...

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 No. 11,327,669 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in U.S. Patent No. 11,327,669 would have been obvious to a Person of Ordinary Skill in the Art (POSITA) at the time the invention was made. The analysis is based on combining the teachings of the prior art references cited during the patent's prosecution. The key inventive concept of the '669 patent appears to be the integration of a user-configurable policy at the device controller level that not only manages the trade-off between storage capacity and data reliability but also enables features like data immutability ("refuse a delete request") and remote management of storage metadata.

A POSITA in this field would likely be an engineer or computer scientist with experience in data storage systems, including hard disk drive (HDD) or solid-state drive (SSD) controller design, file systems, and enterprise storage architectures (e.g., SAN, NAS).

Combination of Prior Art Rendering the Claims Obvious

The independent claims of the '669 patent (1, 14, and 20)...

4. Litigation History of the Patent

Public records reflect that the 11327669 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Gaea, LLC v. Meta Platforms, Inc. — 4:26-cv-00348 · U.S. District Court for the Northern District of Texas · filed 2026-03-23 · open
- Gaea, LLC v. SAMSUNG ELECTRONICS CO., LTD. et al. — 2:26-cv-00264 · U.S. District Court for the Eastern District of Texas · filed 2026-03-31 · open

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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