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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. 11328206 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11328206 (the "11328206 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

Patent Analyst Summary: US 11,328,206 B2
Date of Analysis: April 26, 2026
This report provides a concise summary of United States Patent 11,328,206 B2, including key bibliographic details, a summary of the invention, and a plain-language explanation of its independent claims.

I. Bibliographic Information
• Title: Systems and methods for optimizing operations of computing devices using deep neural networks
• Assignee: SRI International
• Inventors: Sek M. Chai, David C. Zhang, Mohamed R. Amer, Timothy J. Shields, Aswin Nadamuni Raghavan, Bhaskar Ramamurthy
• Filing Date: June 16, 2017
• Issue Date: May 10, 2022
• Abstract: The patent describes a system where the operations of…

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 11328206 Patent:

Analysis of Prior Art Cited for US Patent 11,328,206
This analysis details the prior art references cited by the USPTO examiner during the prosecution of US Patent 11,328,206. Each reference is assessed for its potential to anticipate the independent claims of the '206 patent under 35 U.S.C. § 102. The priority date for the '206 patent is June 16, 2016. All cited references predate this.
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1. US Patent 9,984,270 B2: "Neural network-based processor and method of operation"
• Full Citation: US 9,984,270 B2, "Neural network-based processor and method of operation," assigned to International Business Machines Corporation.
• Publication Date: May 29, 2018 (Filed: July 1, 2015). The filing date precedes the '206 patent's priority date.
• Brief Description: This patent describes a processor that uses a neural network to predict future instructions. The neural network is trained on instruction traces and can predict instruction types, addresses, and data values. The goal is to improve performance by pre-fetching and pre-executing instructions based on the neural network's predictions,…

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 11,328,206
This analysis evaluates the obviousness of the independent claims of US Patent 11,328,206 (the '206 patent) under 35 U.S.C. § 103. The core of this inquiry is whether the differences between the claimed invention and the prior art would have been obvious to a "person having ordinary skill in the art" (PHOSITA) at the time the invention was made. This requires not only finding the claimed elements in the prior art but also establishing a clear reason or "motivation to combine" those elements.
A PHOSITA in this technical domain (computer architecture and machine learning) around the 2016 priority date would be a computer engineer or scientist with graduate-level education and experience in processor design, performance analysis, and the application of machine learning models to system optimization. Such a person is presumed to have knowledge of all relevant public prior art.
The primary prior art references considered are:
• US 9,984,270 B2 ("'270 patent"): Teaches a processor with an integrated neural network that predicts future…

4. Litigation History of the Patent

Public records reflect that the 11328206 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• MAGMA SCIENTIFIC, LLC. v. Amazon Web Services, Inc. — 7:26-cv-00093 · U.S. District Court for the Western District of Texas · filed 2026-03-13 · active

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]