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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. 11374508 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11374508 (the "11374508 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. 11,374,508
Date of Analysis: April 30, 2026
This report provides a summary of U.S. Patent No. 11,374,508, including its key bibliographic details and a plain-language interpretation of its independent claims.
Bibliographic Information:
• Title: Electric drive system and energy management method
• Assignee: The current assignee of record is Edison Innovations LLC, following a series of assignments from the original assignee, General Electric Co.
• Inventors: Jian Zhou, Fei Xu, Dong Liu, Hai Qiu, Pengju Kang.
• Filing Date: May 4, 2020
• Issue Date: June 28, 2022
• Abstract: The patent describes an electric drive system composed of an energy storage system…

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 11374508 Patent:

Analysis of Prior Art for U.S. Patent No. 11,374,508
This analysis reviews the prior art references cited during the prosecution of U.S. Patent No. 11,374,508. The independent claims (1, 7, and 12) of this patent describe a dual-electric motor drive system for a vehicle. The core inventive concept appears to be the specific powertrain architecture and the corresponding control strategy. This architecture includes a first electric motor coupled to a transmission device, and a second electric motor, with both feeding into a power split device that contains one or more planetary gear sets. An Energy Management System (EMS) selectively engages only the first motor for low-demand situations (starting, cruising) and both motors for high-demand situations (accelerating, climbing hills).

Cited U.S. Patent References
The following prior art patents were considered by the USPTO examiner during the patent's prosecution.
1. U.S. Patent No. 9,800,182 B2 (Zhou et al.)
• Full Citation: US 9,800,182 B2
• Title: Electric drive system and energy management method
• Publication Date: October…

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. 11,374,508 under 35 U.S.C. § 103
This analysis evaluates whether the invention claimed in U.S. Patent No. 11,374,508 (the '508 patent) would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention. The standard for obviousness under 35 U.S.C. § 103 prevents the patenting of an invention if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious to a PHOSITA.
For the purpose of this analysis, a PHOSITA is considered to be an engineer with a degree in mechanical or electrical engineering and several years of experience in the design and development of electric or hybrid vehicle powertrains, including motor control systems and transmission technologies.
The independent claims (1, 7, and 12) of the '508 patent are directed to a dual-motor electric drive system. The key features are:
1. A specific powertrain architecture including a first motor, a transmission, a second motor, and a power split device comprising "one or more…

4. Litigation History of the Patent

Public records reflect that the 11374508 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Bunker Hill Technologies LLC v. Toyota Motor North America Inc. et al. — 2:25-cv-01133 · U.S. District Court for the Eastern District of Texas · filed 2025-11-18 · pending

• Toyota Motor Corporation v. Bunker Hill Technologies, LLC — IPR2026-00334 · Patent Trial and Appeal Board (PTAB) · filed 2026-04-07 · Pending Institution Decision

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]