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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. 11383405 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11383405 (the "11383405 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

An analysis of US Patent 11,383,405 is provided below.

Title: Methods for producing ceramic molded body and ceramic structure

Assignee: NGK Insulators Ltd

Inventors:

- Keita Ito
- Yuichi Tajima
- Yoshimasa Kondo

Filing Date: December 29, 2020

Issue Date: July 12, 2022

Abstract:

The patent describes a method for producing a ceramic molded body. The process involves using an extrusion molding machine with a temperature control portion to shape a ceramic molding material. The extruded body is then cut to a predetermined length, and its dimensions are measured. A key aspect of the invention is the pre-established relationship between the temperature of the control portion and the...

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 11383405 Patent:

Analysis of Prior Art for U.S. Patent 11,383,405

An evaluation of the prior art cited during the prosecution of U.S. Patent 11,383,405 reveals several key references that the USPTO examiner considered. These documents are crucial for understanding the landscape of existing technology at the time of the invention and for assessing the patent's novelty and non-obviousness. The following analysis details the most relevant prior art and its potential impact on the claims of the '405 patent.

Key Prior Art and Potential Anticipation

The core of U.S. Patent 11,383,405 lies in its method for controlling the dimensional accuracy of a ceramic molded body by creating a feedback loop. This loop involves measuring the dimensions of the body after it has been cut but before it is dried, and then using a pre-established relationship between those dimensions and the temperature of a control portion of the extrusion machine to adjust the temperature for subsequent production (Claim 1).

Here are the most significant prior art references and their relevance to the claims:

1. JP2017536549A...

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:

An analysis of the obviousness of US patent 11,383,405 under 35 U.S.C. § 103 is provided below, based on the prior art cited in the patent's file.

Person Having Ordinary Skill in the Art (PHOSITA)

A person having ordinary skill in the art (PHOSITA) for this patent would be an engineer or materials scientist with a bachelor's degree or higher in ceramic, chemical, or mechanical engineering, and several years of experience in the field of ceramic manufacturing, specifically with extrusion processes for products like automotive catalysts or particulate filters. This individual would be familiar with process control systems, methods for dimensional measurement, and the effects of process parameters (like temperature and material composition) on the final ceramic product.

Obviousness Analysis of Independent Claim 1

Claim 1 recites a method with the following key elements:

- (a) Extrusion molding a ceramic material using a machine with a temperature control portion.
- (b) Cutting the extruded body to a predetermined length.
- (c) Measuring a dimension of the cut ceramic molded body...

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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