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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. 11418466 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11418466 (the "11418466 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**

A concise summary of U.S. Patent 11,418,466 is as follows:

Title: Two-way real time communication system that allows asymmetric participation in conversations across multiple electronic platforms

Assignee: Disintermediation Services Inc

Inventors:

- John Patrick Francis Dandison
- James Allen Johnson
- Paul Joseph Lyman Schottland

Filing Date: May 10, 2022

Issue Date: August 16, 2022

Abstract:

Methods, systems, and apparatuses, including computer programs encoded on computer-readable media, for receiving a first communication request, from a web browser of a first user. A request for information is sent, using a first active communication protocol, to the web browser. A first...

## **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 11418466 Patent:

Analysis of Prior Art Cited in U.S. Patent 11,418,466

As of April 28, 2026, the following is a technical analysis of the prior art references cited during the prosecution of U.S. Patent 11,418,466. This analysis examines each reference's potential to anticipate the independent claims (Claim 1 and Claim 18) of the '466 patent under 35 U.S.C. § 102.

The core of the invention in U.S. Patent 11,418,466, as defined by its independent claims, involves a system and method for managing web-based communication. Key elements include:

- Receiving a communication request from an unauthenticated user's web browser.
- Sending a "request for information" from a "responder" to that user as part of a conversation.
- Storing an association between the conversation and a unique conversation identifier.
- Handling communications for a second user, potentially using a different communication protocol (e.g., SMS, instant messaging).
- Using a separate conversation identifier for the second user's conversation to keep the communications distinct.

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Prior Art Reference Analysis

Based on the file...

### **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 11,418,466 under 35 U.S.C. § 103

Date of Analysis: April 28, 2026

Patent Analyzed: U.S. Patent 11,418,466 ("the '466 patent")

Priority Date: October 17, 2011

Introduction

This analysis evaluates whether the independent claims (Claim 1 and Claim 18) of the '466 patent would have been obvious to a Person Having Ordinary Skill in the Art (POSITA) at the time of the invention, with a priority date of October 17, 2011. An invention is considered obvious under 35 U.S.C. § 103 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 POSITA. This often involves combining or modifying teachings from multiple prior art references.

A POSITA in this context would likely be an individual with a bachelor's degree in computer science or a related field and several years of experience in web application development, server-side programming, and familiarity with various real-time communication protocols (e.g., HTTP, SMS, XMPP/IM) prevalent before October 2011.

The core...

### **4. Litigation History of the Patent**

Public records reflect that the 11418466 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Disintermediation Services, Inc. v. Perq Software, LLC — U.S. District Court for the Southern

## 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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