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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. 11431431 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11431431 (the "11431431 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 Report: US 11,431,431 B2

Date of Analysis: May 6, 2026

This report provides a concise summary of United States Patent No. 11,431,431 B2, including its key bibliographical data, abstract, and a plain-language overview of its independent claims. The analysis also notes any relevant legal proceedings found in the public record.

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### I. Patent Overview

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| Title: | Add/drop multiplexer, network system, transmission method, non-transitory computer readable medium, and management device |

| Assignee: | Radiant Patents LLC |

| Inventor: | Yurie Matsuyama |

| Filing Date: | June 23, 2021 |

| Priority Date: | January 27, 2015 |

| Issue Date: | August 30, 2022 |

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## **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 11431431 Patent:

### **IV. Prior Art Analysis for US 11,431,431**

This section evaluates the prior art references cited by the USPTO examiner during the prosecution of US Patent 11,431,431. The analysis focuses on the potential for these references to anticipate the patent's claims under 35 U.S.C. § 102. A claim is anticipated if every element of that claim is found in a single prior art reference. The independent claims (1, 4, 7) are the primary focus, as the invalidity of an independent claim typically renders its dependent claims invalid as well.

The core invention of US 11,431,431 is an optical communication apparatus (and corresponding system and method) that includes:

1. A demultiplexer to split a wavelength multiplexed signal.
2. An attenuator to adjust the power of a demultiplexed optical signal.
3. A controller that receives "connection information" about a "connected target" (i.e., the type of device connected to an output port).
4. The controller then sends a specific attenuation amount to the attenuator based on the type of device connected (e.g., a different amount for a "first optical...").

## **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 11,431,431 under 35 U.S.C. § 103

Date of Analysis: May 8, 2026

Patent at Issue: US 11,431,431 B2 ("the '431 patent")

This analysis evaluates the obviousness of the independent claims of the '431 patent in view of prior art cited during its prosecution. Under 35 U.S.C. § 103, a patent claim is invalid if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (POSITA).

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### **I. Summary of the Invention**

The core concept of the '431 patent is an optical communication apparatus (such as an add/drop multiplexer) that dynamically adjusts the power level of an optical signal using a variable attenuator. The key feature is that the specific attenuation amount is selected by a controller based on "connection information" it receives about the target device to which the signal is being sent. The claims specify that a different attenuation amount is used if the connected target is a "first optical device"...

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

Public records reflect that the 11431431 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Radiant Patents LLC v. Nokia Corporation et al. — 2:26-cv-00074 · U.S. District Court for the Eastern District of Texas · filed 2026-01-26 · 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]

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