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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. 11589880 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11589880 (the "11589880 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 No. 11,589,880, including a plain-language overview of its independent claims, is provided below. The patent is the subject of a lawsuit filed by AngioDynamics, Inc. against Endovascular Engineering, Inc., as of April 2026. No records of proceedings before the Court of Appeals for the Federal Circuit (CAFC) for the 2026 docket were found.

Summary of U.S. Patent No. 11,589,880

Title: System and methods for removing undesirable material within a circulatory system utilizing during a surgical procedure

Assignee: Angiodynamics Inc.

Inventors:

- Lishan Aklog
- Michael J. Glennon

Filing Date: July 1, 2019

Issue Date: February 28, 2023

Abstract:

A method for...

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 11589880 Patent:

Based on a review of the references cited during the prosecution of U.S. Patent No. 11,589,880, the following patents and patent applications are identified as the most relevant prior art. The analysis focuses on their potential to anticipate the independent claims (1, 15, and 20) under 35 U.S.C. § 102. For a reference to anticipate a claim, it must disclose every element of that claim, either explicitly or inherently, in a single document.

The priority date for U.S. Patent No. 11,589,880 is December 20, 2007. All references discussed below predate this priority date.

Analysis of Most Relevant Prior Art

1. U.S. Patent No. 6,245,088 B1 (Fischell et al.)

- Full Citation: U.S. Patent No. 6,245,088 B1, "Apparatus and method for treating vascular occlusions," issued to Fischell et al.
- Publication Date: June 12, 2001 (Filed: July 23, 1999).
- Brief Description: Fischell describes a system for removing occlusive material, such as thrombus, from a blood vessel. The system consists of an aspiration catheter with a self-expanding, funnel-shaped distal tip made of a material like...

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:

Here is an analysis of the obviousness of U.S. Patent No. 11,589,880 under 35 U.S.C. § 103, based on the provided prior art.

Obviousness Analysis under 35 U.S.C. § 103

Under United States patent law, an invention is considered obvious and therefore unpatentable if the differences between the invention and the prior art are such that the invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). This analysis considers whether a PHOSITA would have been motivated to combine teachings from multiple prior art references to arrive at the claimed invention with a reasonable expectation of success.

The relevant PHOSITA for US 11,589,880 would be a medical device engineer or an interventional physician (such as an interventional cardiologist or radiologist, or a cardiovascular surgeon) with several years of experience in designing or performing endovascular procedures, particularly those involving catheter-based thrombectomy, embolectomy, and extracorporeal circuits as of the priority date of December 20, 2007....

4. Litigation History of the Patent

Public records reflect that the 11589880 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Angiodynamics Inc v. Endovascular Engineering Inc — 1:26-cv-00469 · Delaware District

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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