

SAMPLE — NOT LEGAL ADVICE. This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[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. 11644693 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11644693 (the "11644693 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

Here is a concise summary and analysis of U.S. Patent No. 11,644,693.

Patent Information:

- Title: Wearable audio system supporting enhanced hearing support
- Assignee: Ingeniospec LLC
- Inventors: Thomas A. Howell, David Chao, C. Douglass Thomas, Peter P. Tong
- Filing Date: July 25, 2022
- Issue Date: May 9, 2023
- Abstract: A wearable device and a method for providing audio to a user are disclosed. According to one aspect, a wearable device includes at least one electrical component configured to be positioned on or within a head-worn device. The electrical component is configured to provide an audio output to a user wearing the head-worn device.

Legal Status and Litigation:

A search...

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 11644693 Patent:

Analysis of Prior Art for U.S. Patent No. 11,644,693

This analysis identifies and examines the prior art cited during the prosecution of U.S. Patent No. 11,644,693 ("the '693 patent"). The following references were considered by the USPTO examiner and are listed on the face of the patent. Each entry includes the full citation, relevant dates, a brief description of its technology, and an analysis of the claims in the '693 patent it might be considered to anticipate under 35 U.S.C. § 102.

The '693 patent, titled "Wearable audio system supporting enhanced hearing support," describes a pair of eyeglasses with integrated electronics, including a speaker, a wireless receiver, a battery, and a processor. The core of the invention lies in the processor's ability to apply a user's specific hearing profile to wirelessly received audio signals, thereby providing personalized hearing enhancement.

Cited U.S. Patent Documents

1. U.S. Patent No. 6,694,034 B1 (Hanson)

- Full Citation: US 6,694,034 B1, "Personal audio system using bone conduction"
- Publication Date: February 17, 2004
- Filing...

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:

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

This analysis evaluates the claims of U.S. Patent No. 11,644,693 ("the '693 patent") for obviousness in light of the prior art references cited during its prosecution. The standard for obviousness, as defined in 35 U.S.C. § 103, is whether 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 (PHOSITA). For the purpose of this analysis, a PHOSITA is considered to be an engineer with a degree in electrical or computer engineering and several years of experience in the design of wearable consumer electronics, portable audio devices, or hearing aid technology.

The core invention of the '693 patent, as defined by independent claims 1 and 16, is the integration of a complete, personalized hearing enhancement system into the temple of a pair of eyeglasses. This system includes a power source, a wireless receiver, a speaker, and a processor specifically configured to modify wirelessly...

4. Litigation History of the Patent

Public records reflect that the 11644693 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Ingeniospec, LLC v. Apple Inc. — 1:25-cv-00867 · U.S. District Court for the Western District of Texas · filed 2025-06-09 · 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]

DISCLAIMER. This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.

Generated May 14, 2026 by ihatepatentrolls.com — sample only.