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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. 11666827 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11666827 (the "11666827 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 US Patent 11,666,827, along with details of related 2026 court proceedings, is provided below.

Summary of US Patent 11,666,827

Title: Systems and methods for capture and use of local elements in gameplay

Assignee: Imaginear Inc

Inventors:

- Yousuf Chowdhary
- Jeffrey Brunet
- Ravinder Sharma

Filing Date: September 23, 2022

Issue Date: June 6, 2023

Abstract:

A computer-implemented method is provided for enabling virtual gameplay. Access is provided to at least one video game in which a player is able to interact with the video game according to a storyline. A player location is detected and stored. A local element is retrieved from a database based on the player...

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 11666827 Patent:

Analysis of Prior Art for US Patent 11,666,827

The following analysis details the most relevant prior art cited against US Patent 11,666,827. This information is critical in understanding the landscape of innovation at the time of the invention and is central to the ongoing validity challenges faced by the patent. Each reference's potential to anticipate the patent's claims, particularly under 35 U.S.C. § 102, is examined.

Examiner-Cited Prior Art

The following references were cited by the USPTO patent examiner during the prosecution of the application that led to US Patent 11,666,827.

1. US Patent No. 8,298,065 B2 (the '065 patent)

- Full Citation: US Patent No. 8,298,065 B2, "Location-based services in a virtual world"
- Assignee: Microsoft Corporation
- Filing Date: June 1, 2009
- Publication Date: October 30, 2012
- Brief Description: The '065 patent describes a system where a user's real-world location, determined by GPS or other means, is used to influence their experience in a virtual world. It discloses providing location-based services, content, and advertisements to a...

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:

Based on the provided prior art, here is an analysis of the obviousness of US Patent 11,666,827 under 35 U.S.C. § 103.

Obviousness Analysis of US Patent 11,666,827

Under 35 U.S.C. § 103, an invention is unpatentable if the differences between the 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). The analysis of US Patent 11,666,827 suggests that its claims would have been obvious over combinations of the cited prior art.

A PHOSITA in this context would be a software engineer or game developer with experience in mobile application development and networked multiplayer games, familiar with location-sensing technologies (like GPS) and their integration into software applications as of the priority date of November 19, 2012.

Argument 1: Obviousness over US 2011/0212771 A1 (Google) in view of General Knowledge and Game Design Principles

The '771 publication serves as a strong primary reference as it discloses the core framework of a multiplayer,...

4. Litigation History of the Patent

Public records reflect that the 11666827 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Imaginear Inc v. Niantic Inc — 26-1720 · Court of Appeals for the Federal Circuit · filed 2026-04-22 · Open
- Niantic, Inc. v. ImagineAR, Inc. — IPR2025-01273 · USPTO Patent Trial and Appeal Board · 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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