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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. 11693450 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11693450 (the "11693450 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 Analysis: US 11,693,450 B2

Date of Analysis: May 1, 2026

Patent Number: 11,693,450

Title: Flexible display computing devices

Assignee: Lepton Computing LLC

Inventor: Stephen E. Delaporte

Filing Date: April 12, 2022

Issue Date: July 4, 2023

Abstract:

This patent describes reconfigurable touch screen computing devices with folding configurations. These devices feature flexible displays composed of segments that can be moved from a compact, folded state to an expanded, open state. The compact form factor is designed to be similar in size to a handheld phone and may include a speaker and microphone. In its expanded state, the device resembles a tablet computer and can...

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

Public records reflect that the 11693450 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Lepton Computing LLC v. Samsung Electronics America Inc et al. — 2:26-cv-00338 · Texas Eastern District Court · filed 2026-04-23 · Open
- Lepton Computing LLC v. Samsung Electronics et al. — U.S. District Court for the Eastern District of Texas · Active
- Lepton Computing LLC v. Samsung Electronics Co., Ltd. et al. — US District Court for the Eastern District of Texas · filed 2026-04-26 · pending

### 3. 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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