

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. 11709037 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11709037 (the "11709037 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

I have searched the USPTO database for "US Patent 11709037" and the CAFC dockets. The initial search results provide general information about how to search the USPTO and CAFC databases, but do not contain specific information about patent number 11709037. The patent text provided in the prompt appears to be the most reliable source of information for this specific patent. Therefore, I will proceed to analyze the provided text to extract the requested information.

- Title: Automated detonation of fireworks
- Assignee: Titan International Technologies Ltd
- Inventor(s): Kevin Wu
- Filing Date: December 31, 2020
- Issue Date: July 25, 2023
- Abstract: A detonation wire has a firing module...

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 11709037 Patent:

An analysis of the prior art cited in U.S. Patent No. 11,709,037, "Automated detonation of

fireworks," reveals several key patents that disclose various elements of the invention. This analysis examines the most relevant of these prior art references and their potential to anticipate the claims of the '037 patent under 35 U.S.C. § 102.

Analysis of Prior Art

The following patents were cited as prior art during the prosecution of the '037 patent:

1. U.S. Patent No. 9,429,393 B2: Remote-controlled pyrotechnic ignition system
 - Full Citation: US 9429393 B2, "Remote-controlled pyrotechnic ignition system," filed by Hall.
 - Publication Date: August 30, 2016 (filed April 23, 2014).
 - Brief Description: This patent describes a remote-controlled system for igniting pyrotechnics. It includes a remote control transmitter and a receiver connected to a firing module. The system allows for the sequential firing of multiple fireworks. A key feature is a reusable fuse-lighting element.
 - Potential Anticipation of Claims: This patent appears to disclose a system with a remote control, a firing...

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:

An analysis of the obviousness of U.S. Patent No. 11,709,037 ("the '037 patent") under 35 U.S.C. § 103 requires a determination of whether the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (a "PHOSITA"). This analysis is performed from the perspective of a PHOSITA before the patent's priority date of September 2, 2016.

The '037 patent discloses a system for the automated detonation of fireworks, controlled by a mobile device, which features a sophisticated user interface for show design and a novel hybrid ignition connector.

As no prior art references were provided for this analysis, a search for relevant art was conducted based on the key features of the '037 patent. The following analysis is based on a hypothetical combination of prior art references that a PHOSITA would have been aware of before the critical date.

I. Obviousness of System and Method Claims

The '037 patent describes a system and method where a...

4. Litigation History of the Patent

Public records reflect that the 11709037 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Titan Technologies International Inc v. Phantom Fireworks Showrooms LLC et al. — 26-1731 · Court of Appeals for the Federal Circuit · filed 2026-04-23 · Open
- Titan International Technologies, LTD v. COBRA Firing Systems, LLC et al. — 2:24-cv-00861 · U.S. District Court for the District of Nevada · filed 2024-05-07 · On appeal

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.