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[Your Name]

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[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 11716171B2 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11716171B2 (the "11716171B2 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**

US Patent 11716171B2: Concise Summary

Title: Wireless communication terminal and wireless communication method for multi-user concurrent transmission

Assignee: Wilus Institute of Standards and Technology Inc.

Inventors: Woojin AHN, Yongho Kim, Jinsam Kwak, Juhjung Son

Filing Date: January 11, 2021 (Application number US17/145,670)

Issue Date: August 1, 2023

Abstract:

The patent describes a wireless communication terminal and method for efficiently managing simultaneous data transmissions from multiple terminals. It details a base wireless communication terminal that transmits a trigger frame to initiate multi-user uplink transmission, receives uplink data through allocated resources, and...

## **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 11716171B2 Patent:

As a patent analyst, I need to identify the most relevant prior art for US patent 11716171B2 by

examining its patent citations. However, the "Full patent text" provided in the prompt does not contain a "References Cited" section or a list of "Prior art documents."

While the prompt instructs me to "Search the USPTO database for the specific patent number 11716171B2" and "Look at each patent citation," my available googlesearch tool cannot directly parse the content of a specific webpage section (like "References Cited" on Google Patents) to extract structured data such as full citations, dates, and descriptions for each cited patent. My attempts to use googlesearch to directly retrieve this structured list have yielded general information about patent searching rather than the specific citations for US11716171B2. Therefore, I am unable to provide the detailed list of prior art, including full citations, publication/filing dates, brief descriptions, and potential anticipation under 35 U.S.C. § 102, because this information is not present in the authoritative patent text provided and...

### **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:

US patent 11716171B2 relates to a base wireless communication terminal and a method for efficiently managing simultaneous multi-user uplink data transmissions. The core inventive concept, as described in the "Technical Solution" and "Abstract" of the patent, involves a base wireless communication terminal (e.g., an Access Point or AP) that transmits a trigger frame for multi-user uplink transmission, receives multi-user uplink data, and then transmits a block ACK through the allocated resources. A key feature of the invention is that the transmission of the block ACK in each resource is terminated at the same time, achieved by either padding the block ACK or inserting duplicated ACK information.

Based on the provided patent text, a person having ordinary skill in the art (PHOSITA) would have found the claimed invention obvious under 35 U.S.C. § 103 by combining the general understanding of multi-user communication and acknowledgment mechanisms in wireless local area networks (WLANs) with the patent's own disclosure regarding frame length alignment. Elements of the Invention to be...

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

Public records reflect that the 11716171B2 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Samsung Electronics Co., Ltd. v. Wilus Institute of Standards and Technology Inc. — IPR2025-01110 · Patent Trial and Appeal Board · filed 2025-06-24 · Pending - Instituted
- Wilus Institute of Standards and Technology Inc. v. HP Inc. — 2:25-cv-00069-JRG-RSP · U.S. District Court, Eastern District of Texas, Marshall Division · filed 2025-01-23 · Open; consolidated
- Wilus Institute of Standards and Technology Inc. v. Samsung Electronics Co., LTD. et al. — 2:25-cv-00070-JRG-RSP · U.S. District Court, Eastern District of Texas, Marshall Division · filed 2025-01-23 · Open; consolidated

## 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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