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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. 11778415 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11778415 (the "11778415 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

Of course. Here is a technical analysis of US Patent No. 11,778,415.

Patent Information

- Title: Location sharing application in association with services provision
- Assignee: XONE Inc.
- Inventor: Richard D. Haney
- -Filing Date: May 4, 2022
- Issue Date: October 3, 2023
- Abstract: This patent describes a system and method for enabling users of wireless communication devices (like cell phones) to share their real-time location with selected individuals or groups, referred to as "buddies." The system utilizes a central server that receives GPS location data from users' devices. Users can create and manage "Buddy Lists" to control who can see their location. The location of buddies is...

## 4. Litigation History of the Patent

Public records reflect that the 11778415 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- X One Inc v. Neighborfavor Inc et al. — 2:26-cv-00313 · Texas Eastern District Court · filed

2026-04-17 · Open

• X One Inc v. Dominos Pizza Franchising LLC et al. — 2:26-cv-00311 · Texas Eastern District Court · filed 2026-04-17 · Open

• X One Inc v. DoorDash Inc et al. — 2:26-cv-00312 · Texas Eastern District Court · filed 2026-04-17 · Open

• X One Inc v. Pizza Hut Of America Inc et al. — 2:26-cv-00314 · Texas Eastern District Court · filed 2026-04-17 · Open

### 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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