

**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. 11798576 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11798576 (the "11798576 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 thorough analysis of US Patent 11,798,576 reveals an invention focused on enhancing in-vehicle communication systems by adaptively controlling audio gain based on real-time signal-to-noise ratios.

Title: Methods and apparatus for adaptive gain control in a communication system

Assignee: The patent is currently assigned to Cerence Operating Co.

Inventors:

- Tobias Herbig
- Meik Pfeffinger
- Bernd Iser

Filing Date: November 1, 2019

Issue Date: October 24, 2023

Abstract:

The patent describes methods and apparatuses for a communication system, typically within a vehicle, that utilizes microphones and loudspeakers. The system determines noise and speech level estimates from a received...

## **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 11798576 Patent:

Analysis of Prior Art for U.S. Patent 11,798,576

An analysis of the prior art cited during the prosecution of U.S. Patent 11,798,576, "Methods and apparatus for adaptive gain control in a communication system," reveals several key patents that inform the landscape of the invention. This analysis examines the most relevant of these citations, their core teachings, and their potential relationship to the claims of the '576 patent. The following references were considered material by the USPTO examiner in determining the patentability of the invention.

---

U.S. Patent 9,124,234 B1

- Full Citation: US 9,124,234 B1
- Title: Method and apparatus for adaptive automatic gain control
- Assignee: Entropic Communications, LLC.
- Filing Date: April 11, 2014
- Publication Date: September 1, 2015
- Brief Description: This patent details a method for adaptive automatic gain control (AGC) that adjusts its parameters based on the characteristics of an input signal. It describes a system that measures signal power and adjusts gain, but also adapts the attack and decay rates of the AGC based on...

### **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:

Obviousness Analysis of US Patent 11,798,576 under 35 U.S.C. § 103

This analysis examines the non-obviousness of US Patent 11,798,576, focusing on its independent claims (1, 12, and 18). The core of the invention is a method and system for adaptive gain control in a communication system, particularly for in-car communication (ICC), which fuses Automatic Gain Control (AGC) and Noise Dependent Gain Control (NDGC) into a single module. This module aims to maintain a constant Signal-to-Noise Ratio (SNR) at the listener's ear by adapting an "actual gain" to follow a "target gain" within a predefined SNR range.

A Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention (priority date of February 27, 2014) would be an engineer with a background in digital signal processing, acoustics, and software development, likely with experience in automotive audio systems.

The analysis below proposes combinations of prior art that a PHOSITA might have been motivated to combine, potentially rendering the claims of the '576 patent obvious.

Combination 1: US 2013/0179163 A1...

### **4. 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 [ihatepatenttrols.com](http://ihatepatenttrols.com) — sample only.*