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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. 11806120 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11806120 (the "11806120 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

Here is a concise summary of U.S. Patent 11,806,120.

Title: Health risk indicator determination

Assignee: Beijing Shunyuan Kaihua Technology Co Ltd

Inventors: Ulrik Wisløff, Christian Ragnar Gutvik

Filing Date: February 4, 2021

Issue Date: November 7, 2023

Abstract:

A method and apparatus for determining health risk for a user are described. The method involves obtaining heart rate values and motion information of the user over a monitoring period. The heart rate values are sampled at a variable rate based on a comparison of previous heart rate measurements to the user's heart rate range (the difference between their maximum and resting heart rate). An expected heart rate level is...

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 11806120 Patent:

Based on my analysis of the patent document and its listed citations, here is a summary of the

most relevant prior art for US patent 11,806,120. This analysis focuses on references cited by the USPTO examiner, as they were deemed most pertinent during the examination process.

Analysis of Examiner-Cited Prior Art

The following references were considered by the patent examiner during the prosecution of the application for US patent 11,806,120. The analysis details their potential relevance to the patent's independent claims (1, 9, and 17), which form the core of the invention.

1. US20140073486A1 - "Systems, devices and methods for continuous heart rate monitoring and interpretation"

- Full Citation: US Patent Application Publication No. US20140073486A1
- Publication Date: March 13, 2014 (Filed September 4, 2012)
- Brief Description: This application by Bobo Analytics, Inc. describes a system using a wearable device for continuous heart rate monitoring. It discloses collecting and interpreting both heart rate and motion data to provide users with metrics about their physical...

4. Litigation History of the Patent

Public records reflect that the 11806120 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Zepp North America Inc et al. v. Oura Health Oy — 2:26-cv-00316 · Texas Eastern District Court · filed 2026-04-21 · Open

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]

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