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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 11825139 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11825139 (the "11825139 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 11825139, titled "Bitrate and pipeline preservation for content presentation," was issued to OpenTV Inc. on November 21, 2023. The patent was filed on November 9, 2021, under application number US17/454,169. The inventors are Amarendra N. Gogoi, Sanjay Kumar Gupta, and Ravikant Swami.

Abstract:

The patent describes systems and methods designed to optimize the content change process, such as switching channels or selecting new content. A digital receiver initiates playback of a first piece of content. Upon receiving a selection for a new piece of content, the receiver transitions to the new content while maintaining the bitrate used for the initial content playback....

## **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 11825139 Patent:

To identify the most relevant prior art for US patent 11825139, I will first access the patent's full text to review its "References Cited" section. This section, provided by the patent office, lists the prior art that the examiner and applicant considered relevant during prosecution.

Based on the full patent text of US11825139, the following prior art references are cited:

Patent Citations:

- US20060215760A1

Full Citation: US20060215760A1 (Monaco Joseph W.)

Publication/Filing Date: Publication date: 2006-09-28; Filing date: 2004-10-27

Brief Description: Titled "Optimal rate allocation for a group of channels," this patent application describes systems and methods for allocating transmission bandwidth among a group of video channels based on various factors to optimize overall video quality. This could relate to how US11825139 manages bitrate for content delivery.

Potentially Anticipating Claim(s) under 35 U.S.C. § 102: Potentially anticipates claims relating to maintaining or adjusting bitrate for content playback, particularly those in Claim 1, 6, 7, and 13, which deal with...

### **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 under 35 U.S.C. § 103

An invention is considered obvious and thus not patentable "if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art to which the claimed invention pertains." The analysis of obviousness involves considering the scope and content of the prior art, differences between the prior art and the claimed invention, the level of ordinary skill in the art, and any secondary considerations of non-obviousness. A person having ordinary skill in the art (PHOSITA) is presumed to understand all existing technology and possess ordinary creativity.

The patent US11825139 addresses the problem of optimizing content changes, such as channel switching, by preserving the download bitrate and a portion of the content playback pipeline. The core inventive concept lies in maintaining a previously established bitrate for new content and selectively preserving pipeline components...

### **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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