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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. 11841803 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11841803 (the "11841803 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

Patent Summary: US 11,841,803

A detailed analysis of United States Patent 11,841,803 reveals a system for enhancing graphics processing power by interconnecting multiple smaller graphics processing unit (GPU) "chiplets" to function as a single, powerful GPU.

Title: GPU chiplets using high bandwidth crosslinks

Assignee: The patent was originally assigned to Advanced Micro Devices, Inc. As of a reassignment on November 18, 2024, the current assignee is Onesta IP, LLC.

Inventors:

- Skyler J. Saleh
- Samuel Naffziger
- Milind S. Bhagavat
- Rahul Agarwal

Filing Date: June 28, 2019

Issue Date: December 12, 2023

Abstract: The patent describes a chiplet system where a central processing unit...

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 11841803 Patent:

Analysis of Prior Art for U.S. Patent 11,841,803

Patent in Question: US 11,841,803 B2

- Title: GPU chiplets using high bandwidth crosslinks
- Filing Date: June 28, 2019
- Issue Date: December 12, 2023
- Assignee: Advanced Micro Devices, Inc. (Original), Onesta Ip LLC (Current)
- Summary: This patent details a system and method for utilizing a multi-chiplet graphics processing unit (GPU) architecture. The core innovation lies in connecting multiple GPU "chiplets" using a passive, high-bandwidth crosslink, such as a silicon interposer. This arrangement allows the multiple chiplets to function and be addressed by the central processing unit (CPU) as a single, monolithic GPU. A key aspect is the maintenance of cache coherency across the last-level cache (LLC) of all chiplets, enabling seamless communication and data access between them. The design aims to overcome the manufacturing cost and yield limitations of large, monolithic GPU dies by breaking them into smaller, interconnected functional units.

Potentially Relevant Prior Art

The following patent documents are cited as...

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:

Analysis of Obviousness for US Patent 11,841,803

An analysis of US Patent 11,841,803, titled "GPU chiplets using high bandwidth crosslinks," under 35 U.S.C. § 103 suggests that the claimed invention may be rendered obvious by a combination of prior art references. This analysis is predicated on the legal standard of whether a person having ordinary skill in the art (POSITA) at the time of the invention would have been motivated to combine existing technologies to arrive at the claimed subject matter with a reasonable expectation of success.

A thorough review of the patent's file history, specifically the prior art cited by the USPTO examiner during prosecution, is crucial for a definitive determination. However, based on publicly available information and the state of the art preceding the patent's priority date of June 28, 2019, a compelling case for obviousness can be constructed.

Summary of the Invention

US Patent 11,841,803 describes a system and method for a graphics processing unit (GPU) built from multiple smaller chips, or "chiplets." Key features of the invention...

4. Litigation History of the Patent

Public records reflect that the 11841803 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Onesta IP, LLC v. NVIDIA Corporation — 1:25-cv-00586 · U.S. District Court for the Western District of Texas · filed 2025-04-17 · stayed

- Onesta IP, LLC v. Qualcomm Incorporated et al. — 1:25-cv-00587 · U.S. District Court for the Western District of Texas · filed 2025-04-17 · stayed
- Unified Patents, LLC v. Onesta IP, LLC — IPR2026-00011 · U.S. Patent and Trademark Office, Patent Trial and Appeal Board · Not Instituted - Procedural

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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