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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. 11907553 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11907553 (the "11907553 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

Thoroughly reviewing the provided text, I find that it contains the complete and authoritative information for US Patent 11,907,553, including the title, assignee, inventors, filing date, issue date, and a detailed description of the invention which will allow me to summarize the independent claims in plain language. The text also mentions a litigation case in the Texas Northern District Court. However, the user's request specifically asks for a search of the CAFC (Court of Appeals for the Federal Circuit) dockets. The provided text does not contain information about any CAFC cases. Therefore, I will need to perform a separate search for that specific information.

Updated plan:

Search the...

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 11907553 Patent:

Based on my analysis of U.S. Patent No. 11,907,553 and its cited references, the following prior art is most relevant to the patent's claims.

The core invention of US 11,907,553, as outlined in independent claim 1, is a data storage

device with an on-board controller that can receive a "storage device policy." This policy dictates how the device handles data, including how and where it is stored, whether it can be deleted, and, crucially, allows for storage information (metadata) to be stored at a remote location separate from the device itself.

Analysis of Cited Prior Art

The following patents were cited during the prosecution of the '553 patent and are relevant to its key concepts.

1. U.S. Patent No. 7,631,142 B2: "System and method for enforcing storage policies in a storage device"

- Full Citation:

Patent Number: US 7,631,142 B2

Title: System and method for enforcing storage policies in a storage device

Inventors: Minwen Ji, et al.

Assignee: Hewlett-Packard Development Company, L.P.

Publication Date: December 8, 2009

Filing Date: November 27, 2006

- Brief...

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 U.S. Patent No. 11,907,553

This analysis evaluates the patentability of the claims of U.S. Patent No. 11,907,553 ("the '553 patent") in light of prior art, focusing on the standard of obviousness under 35 U.S.C. § 103. The analysis concludes that the independent claims of the '553 patent would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made.

A claim is considered obvious if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious to a PHOSITA. This analysis primarily combines the teachings of U.S. Patent No. 7,631,142 B2 ("Ji et al.") and U.S. Patent Application Publication No. 2015/0317208 A1 ("Lee et al.").

Independent Claim 1 Analysis

Independent Claim 1 of the '553 patent describes a data storage device comprising:

- A device controller with memory.
- An application with instructions for the controller to:
 1. Receive a storage device policy.
 2. Store content according to the policy.
 3. Record storage information...

4. Litigation History of the Patent

Public records reflect that the 11907553 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Gaea LLC v. [Defendant Name Not Provided] — 4:26-cv-00348 · United States District Court for the Northern District of Texas · Active/Pending

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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