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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 11935082 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11935082 (the "11935082 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

Summary of US Patent 11935082

- Title: Discovering neighborhood clusters and uses therefor
- Assignee: Carnegie Mellon University
- Inventors: Justin Cranshaw, Raz Schwartz, Jason I. Hong, Norman Sadeh-Konieczpol
- Filing Date: January 10, 2022
- Issue Date: March 19, 2024
- Abstract: The patent describes computer-based systems and methods for identifying neighborhood clusters in a geographic region. These clusters feature a specific mix of venues, determined by analyzing venue check-in data. The mix of venues can be based on social similarity between venues, characteristic neighborhood typologies, temporal check-in patterns, or a combination of these factors. The discovered neighborhood...

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 11935082 Patent:

To identify the most relevant prior art for US patent 11935082, I need to access the patent's full citation details and its list of cited references from the USPTO database. Since I cannot directly

interact with a live USPTO search portal, I will rely on the provided patent text to extract the cited prior art references.

Based on the full patent text provided, I will extract information on cited prior art. The "Prior art keywords" section on Google Patents often lists keywords from prior art, but for specific patent citations, I need to look at the "References Cited" section of the full patent document. The provided text is a detailed description of the patent, but it doesn't explicitly list a "References Cited" section with full patent citations in a structured manner typical of a USPTO patent document. However, it does mention prior art and related research papers in the description. Specifically, the patent description mentions the following prior art in relation to its methods:

1. "Distance dependent Chinese restaurant processes," by D. M. Blei and P. I. Frazier, J. Mach....

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:

To establish obviousness under 35 U.S.C. § 103 for US Patent 11935082, it is necessary to identify prior art references that, when combined, would have made the claimed invention obvious to a person having ordinary skill in the art (PHOSITA) at the time of the invention (i.e., before the priority date of August 30, 2012). The patent itself cites and incorporates several relevant academic works that predate this priority date, offering strong grounds for an obviousness analysis. A PHOSITA in this field would likely possess expertise in data mining, machine learning, geographic information systems (GIS), and social network analysis.

The independent claims of US Patent 11935082 generally describe:

- Claims 1 and 9 (Venue-based): A system/method for identifying geographic clusters of venues by storing venue check-in data, generating a pairwise venue similarity matrix based on both geographical distance and social distance (derived from common venue visitors), and then clustering venues using this matrix.
- Claims 17 and 20 (Sub-region-based): A system/method for identifying geographic...

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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