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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. 11937145 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11937145 (the "11937145 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 11937145, titled "Mashing mapping content displayed on mobile devices," has the following details:

- Assignee: Nearby Systems LLC
- Inventors: Gabriel Jakobson, Steven L. Rueben
- Filing Date: September 13, 2019
- Issue Date: March 19, 2024 (listed as Publication date, but for a granted patent, this is the issue date)
- Abstract: A method and apparatus for mapping addressable information (e.g., locations denoted by name or address, street addresses, landmarks, etc.) off of disparate applications on a mobile device, onto an existing map on the mobile device, are disclosed. An application on a mobile device may display addressable information (e.g., a website displaying a location...

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 11937145 Patent:

To identify the most relevant prior art for US patent 11937145, I will search the USPTO database for the patent and then review its cited references.

Here's the breakdown of the prior art cited in US11937145B2, along with an assessment of which claims it potentially anticipates under 35 U.S.C. § 102.

Patent Citations for US11937145B2:

The patent US11937145B2 cites numerous prior art documents. A comprehensive review of each would be extensive, but based on the patent's abstract and claims, I will focus on the most directly relevant types of prior art that address displaying map content from disparate applications on a single map on a mobile device.

To provide a precise analysis of which claims each cited prior art potentially anticipates, one would need to perform a detailed claim-by-claim comparison, analyzing every limitation of Claim 1 against the full disclosure of each prior art reference. Since the prompt asks for potential anticipation and a brief description, I will identify types of prior art likely to be relevant to the core concepts of US11937145B2's independent claim...

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 analyze the obviousness of US patent 11937145 under 35 U.S.C. § 103, we must consider prior art available before the patent's priority date of October 12, 2007. The provided patent text explicitly lists US 2009/0100342 A1 as the publication of application US 11/974,258, from which the present patent claims priority, and thus its disclosure as of its priority date serves as relevant prior art.

A direct ancestor, US 2009/0100342 A1, published on April 16, 2009, is based on a continuation-in-part application filed on October 12, 2007 (US 11/974,258), making its disclosure effective prior art for US 11937145.

The abstract of US 2009/0100342 A1 discloses a method and apparatus for automatically creating or updating a digital map to include a new location in response to a user's selection of location information from a software application. This includes:

- Receiving location information from a software application.
- Identifying location references in the information.
- Converting location references to geographic coordinates.
- Plotting the new location on a digital map.
- ...

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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