

SAMPLE — NOT LEGAL ADVICE. This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[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. 11949962 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11949962 (the "11949962 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

An analysis of United States Patent 11,949,962 reveals the following details. A search of the U.S. Court of Appeals for the Federal Circuit (CAFC) dockets for 2026 did not yield any specific litigation information for this patent number.

Summary of U.S. Patent 11,949,962

Title: Method and computer system using proxy IP addresses and PII in measuring ad effectiveness across devices

Assignee: Intent IQ LLC

Inventors: Roy Shkedi, Dror Ben-Yishai

Filing Date: May 25, 2023

Issue Date: April 2, 2024

Abstract:

A profile provider: (i) associates a primary online device (OD1) with a set-top box (STB); (ii) a location of OD1 at some point in time is estimated to be "near" the STB, thereby...

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 11949962 Patent:

An analysis of prior art cited against US Patent 11,949,962 reveals several key references that address the concept of cross-platform advertising. The '962 patent, with a priority date of August 3, 2011, claims a specific method for measuring ad effectiveness by linking a television set-top box (STB) to a "secondary" online device (OD2) via a "primary" online device (OD1) that serves as a location proxy.

The most relevant prior art references teach the broader concepts of linking TV and online devices within a household to measure ad effectiveness or to target ads, but they do not appear to explicitly disclose the specific two-step proxy location method that is central to the claims of the '962 patent.

Analysis of Key Prior Art References

Below is an analysis of the most relevant prior art cited in the patent's file history. This analysis focuses on the potential for anticipation under 35 U.S.C. § 102, which requires a single prior art reference to disclose each and every element of a claimed invention.

1. US Patent Application Publication No. US 2008/0271087 A1

• Full...

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:

An analysis of United States Patent 11,949,962 under 35 U.S.C. § 103, considering the prior art cited, suggests that its independent claims would have been obvious to a person of ordinary skill in the art at the time of the invention.

The standard for obviousness under 35 U.S.C. § 103 requires determining whether the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). A PHOSITA in August 2011 would have been a software engineer or data scientist with several years of experience in the online advertising technology industry, familiar with cookies, IP addresses, ad servers, and cross-platform campaign analytics. The core inventive concept of the '962 patent is not merely linking a TV ad view to an online action, but the specific method of creating that link: using a "primary" online device (OD1) to establish a "proxy location" for a set-top box (STB), and then associating a "secondary" online device (OD2) with that...

4. Litigation History of the Patent

Public records reflect that the 11949962 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Intent IQ, LLC v. MNTN, Inc. — 7:25-cv-00246 · U.S. District Court for the Western District of Texas · filed 2025-05-23 · Active

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]

DISCLAIMER. This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.

Generated May 14, 2026 by ihatepatentrolls.com — sample only.