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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. 11971612 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 11971612 (the "11971612 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 U.S. Patent 11,971,612

A detailed analysis of U.S. Patent 11,971,612 reveals the following information.

Title: Eyewear docking station and electronic module

Assignee: E Vision Smart Optics Inc.

Inventors: Ronald D. Blum, Yongping Wang, Mark Graham, William Kokonaski, Richard Clompus

Filing Date: September 26, 2022

Issue Date: April 30, 2024

Abstract:

An eyewear system including an eyewear frame and an application module. The eyewear frame including a docking station, and an electronic connector including a first set of preconfigured application connection points. The application module adapted to be mounted to the docking station, and including an electronic device...

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 11971612 Patent:

Analysis of Prior Art for US Patent 11,971,612

Washington D.C. - A detailed analysis of the prior art cited against US Patent 11,971,612, titled "Eyewear docking station and electronic module," reveals several key patents that could potentially anticipate its claims under 35 U.S.C. § 102. The patent, assigned to E Vision Smart Optics Inc., describes a system where an eyewear frame includes a docking station for removably attaching electronic modules, allowing for a variety of functions to be added to the eyewear.

The core of the invention, as detailed in the claims, revolves around an eyewear system comprising a frame with a docking station and an electronic connector with a first set of preconfigured application connection points. An application module, containing an electronic device, has a corresponding second set of connection points. This modular approach allows for functions like audio playback, video recording, and health monitoring to be integrated with the eyewear.

An examination of the cited prior art provides context to the novelty and non-obviousness of these claims....

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 U.S. Patent 11,971,612 under 35 U.S.C. § 103

A person having ordinary skill in the art (PHOSITA) in the field of wearable electronics and eyewear design at the time of the invention would have found the claims of U.S. Patent 11,971,612 obvious by combining the teachings of existing prior art. The core concepts of the patent—a modular eyewear system with a docking station and interchangeable electronic modules—were well-established principles in the field of electronics and had been specifically contemplated for eyewear.

The standard for determining obviousness, as laid out in 35 U.S.C. § 103, is whether the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious to a PHOSITA. The Supreme Court's decision in *KSR International Co. v. Teleflex Inc.* emphasized a flexible approach, considering the common sense and creativity of a PHOSITA.

Prior Art Landscape and Motivation to Combine

The prior art landscape before the earliest priority date of the '612 patent (January 6, 2012)...

4. Litigation History of the Patent

Public records reflect that the 11971612 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- E-Vision Optics, LLC et al. v. Luxottica Group S.p.A. et al. — 8:2023cv02013 · U.S. District Court for the Central District of California · filed 2023-10-26 · 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]

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