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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. 12015376 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12015376 (the "12015376 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

Patent Summary: US 12,015,376 B2

Title: Lead assembly for connecting solar panel arrays to inverter.

Assignee: Shoals Technologies Group, LLC.

Inventor: Dean Solon.

Filing Date: November 29, 2023.

Issue Date: June 18, 2024.

Abstract:

A lead assembly includes a feeder cable, one or more drop lines, and one or more mold structures. Each drop line includes a drop line connector, the drop line connector configured to be capable of detachable connection to a wire harness having a plurality of branches that are each configured to receive electrical power generated by a corresponding photovoltaic (PV) panel resulting in combined electrical power at the drop line connector. The one or more...

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 12015376 Patent:

MIA-TASK-ID: I2PSJLDG75D3LDV2197A

Patent Analysis Report: US 12,015,376 B2

To: File

From: Senior Patent Analyst

Date: May 13, 2026

Subject: Analysis of Most Relevant Prior Art for US Patent 12,015,376 B2

This report provides an analysis of the most relevant prior art cited against U.S. Patent No. 12,015,376 B2 (the '376 patent), titled "Lead assembly for connecting solar panel arrays to inverter." The analysis focuses on the potential for anticipation of the patent's claims under 35 U.S.C. § 102.

The core invention of the '376 patent is a prefabricated electrical lead assembly designed to replace conventional combiner boxes in solar power installations. This assembly features a main feeder cable with one or more integrated "drop lines." These drop lines are terminated with connectors to attach to wire harnesses from solar panel arrays. The key features claimed are the specific configuration of the cables and the use of one or more molded structures to create a durable, environmentally sealed joint at the electrical interconnection point between the feeder cable and the drop...

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. 12,015,376

An analysis of U.S. Patent No. 12,015,376 ('376 patent) and its cited prior art suggests that its claims may be vulnerable to an obviousness rejection under 35 U.S.C. § 103. The legal standard for obviousness, as articulated in *Graham v. John Deere Co.* and clarified in *KSR International Co. v. Teleflex Inc.*, requires a determination of whether the differences between the claimed invention and the prior art would have been obvious to a person having ordinary skill in the art (POSITA) at the time the invention was made. The KSR decision established a flexible approach, rejecting a rigid requirement for a specific "teaching, suggestion, or motivation" (TSM) to combine prior art references. Instead, the inquiry focuses on whether a skilled artisan would have seen a reason to combine the elements in the way the patent claims.

The invention of the '376 patent is a "lead assembly" designed to connect solar panel arrays to an inverter, notably eliminating the need for a traditional combiner box. The core components of the claimed assembly...

4. Litigation History of the Patent

Public records reflect that the 12015376 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Shoals Technologies Group, LLC v. Voltage, LLC — U.S. International Trade Commission · filed 2025-01-09 · 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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