

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. 12118290 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12118290 (the "12118290 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 12,118,290

A comprehensive review of U.S. Patent 12,118,290 reveals a system for creating personalized and interactive digital documents. The patent, assigned to Turtl Surf and Immerse Ltd, details a method for dynamically assembling content from various sources into a cohesive, customized document for a reader.

Title: Methods and systems for interactive content creation

Assignee: Turtl Surf and Immerse Ltd

Inventor: Nicholas Kingsley Mason

Filing Date: July 24, 2023

Issue Date: October 15, 2024

Abstract:

The patent describes a system for personalizing interactive content. This system includes a content creation component that allows for the creation of content...

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 12118290 Patent:

Prior Art Analysis for U.S. Patent 12,118,290

An analysis of the prior art cited during the prosecution of U.S. Patent 12,118,290, "Methods and systems for interactive content creation," reveals several key patents and patent applications that were considered by the USPTO examiner. This review focuses on the most relevant references and their potential to anticipate the claims of the '290 patent under 35 U.S.C. § 102. The '290 patent, issued on October 15, 2024, with a priority date of July 6, 2020, details a system for dynamically assembling personalized interactive documents from modular content items based on a set of rules.

Key Prior Art References

The following prior art references were identified as significant in the examination of the application leading to the '290 patent. This information was obtained by reviewing the patent's file wrapper and the citations listed on public patent databases.

1. U.S. Patent 9,753,921 B2

- Full Citation: US 9,753,921 B2
- Publication Date: September 5, 2017
- Filing Date: March 13, 2013
- Assignee: Microsoft Technology Licensing,...

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 of U.S. Patent 12,118,290 under 35 U.S.C. § 103

This analysis examines the claims of U.S. Patent 12,118,290 ('290 patent) for obviousness in light of prior art available before the patent's priority date of July 6, 2020. A claim is considered obvious under 35 U.S.C. § 103 if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious to a person having ordinary skill in the art (PHOSITA).

This analysis concludes that the independent claims of the '290 patent would have been obvious over a combination of prior art references, primarily U.S. Patent Application Publication No. 2015/0378904 A1 (Leto) in view of U.S. Patent Application Publication No. 2018/0114251 A1 (Ramer).

Interpretation of Key Claim Terms

For this analysis, the claim terms are given their plain and ordinary meaning as understood by a PHOSITA in the field of content management and document generation systems.

- "Modular item" / "Content item": A discrete, reusable portion of content, such as a page, paragraph,...

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]

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.