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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. 12136276 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12136276 (the "12136276 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 12,136,276

A review of U.S. Patent 12,136,276 reveals a technology focused on the automatic calibration of cameras used in vehicles for lane detection and distance estimation. The patent is the subject of a legal challenge filed in 2026.

Title: Camera initialization for lane detection and distance estimation using single-view geometry

Assignee: Motive Technologies Inc.

Inventors: Ali Hassan, Ahmed Ali, Syed Wajahat Ali Shah Kazmi

Filing Date: December 1, 2023

Issue Date: November 5, 2024

Abstract:

The patent discloses methods, devices, and computer-readable media for detecting lanes and objects in image frames from a monocular camera. One embodiment describes a...

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 12136276 Patent:

As a senior US patent analyst, I have reviewed the provided documentation and performed a

search for US Patent No. 12136276.

Based on my analysis of the patent text and publicly available information from the USPTO, the list of prior art references cited by the examiner during the prosecution of US Patent 12136276 is not contained within the provided patent text. A comprehensive analysis of potential anticipation requires the official "References Cited" section from the patent's file history. However, the patent text itself references a commonly-owned U.S. application, which can be considered relevant art. I will analyze this reference.

Analysis of Relevant Art

Referenced Application: U.S. Application Serial No. 17/173,950

- Full Citation: U.S. Patent Application Publication No. US 2022/0254249 A1 (This is the publication of application Ser. No. 17/173,950).
- Filing Date: February 11, 2021.
- Brief Description: This application describes a system for detecting lane markers and estimating distances to objects using a monocular camera. It details a geometric algorithm to...

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:

Based on an analysis of the patent text for US 12136276 and publicly available prior art, several strong arguments for obviousness under 35 U.S.C. § 103 could be constructed. An obviousness rejection requires showing that a person having ordinary skill in the art would have been motivated to combine teachings from prior art references to arrive at the claimed invention with a reasonable expectation of success.

Person Having Ordinary Skill in the Art (POSITA)

A person having ordinary skill in the art (POSITA) for this patent would be someone with a Bachelor's or Master's degree in Computer Science, Electrical Engineering, or a related field, and 2-3 years of experience in the areas of computer vision, machine learning, and/or automotive systems (specifically Advanced Driver Assistance Systems or ADAS). The POSITA would be familiar with common image processing techniques, the principles of camera geometry (e.g., perspective projection, intrinsic/extrinsic parameters), and the architecture and training of deep neural networks, particularly convolutional neural networks (CNNs), for...

4. Litigation History of the Patent

Public records reflect that the 12136276 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Motive Technologies, Inc. v. Samsara, Inc. — 3:24-cv-00902 · U.S. District Court for the Northern District of California · active
- Samsara Inc. v. Motive Technologies, Inc. — IPR2026-00034 · U.S. Patent and Appeal Board · filed 2025-10-17 · initial stages

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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