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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 12143425 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12143425 (the "12143425 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**

US patent 12143425, titled "Rapid predictive analysis of very large data sets using the distributed computational graph," was invented by Jason Crabtree and Andrew Sellers. The application was filed on July 21, 2024, and the patent was granted/issued on November 12, 2024. The current assignee is Qomplx Inc.

Abstract:

The patent describes a system for the predictive analysis of very large datasets using a distributed computational graph. It includes a data receipt software module for receiving streaming data from various sources. In a batch data pathway, a data formalization module formats the input data for storage. A batch event analysis server then inspects this stored data for trends,...

## **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 12143425 Patent:

To identify the most relevant prior art for US patent 12143425, I need to access the full patent document from the USPTO database, which would list the "References Cited" by the examiner. Since I cannot directly access or browse the USPTO Patent Public Search database for the

specific patent number and its cited references through my current tools, I cannot provide a detailed list of prior art citations with publication/filing dates, descriptions, and potentially anticipated claims under 35 U.S.C. § 102.

To perform this task, I would typically navigate to the USPTO Patent Public Search tool, enter the patent number "12143425", and then examine the "References Cited" section within the patent document. This section directly lists the prior art documents considered by the patent examiner during prosecution.

Once I could access that information, for each cited reference, I would:

- Extract the full citation (patent number, inventor, issue date, etc.).
- Note the publication or filing date as relevant for prior art determination (e.g., under 35 U.S.C. § 102).
- Read the abstract and,...

### **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 (35 U.S.C. § 103) for US12143425

Legal Standard for Obviousness

Under 35 U.S.C. § 103, a patent for a claimed invention cannot be obtained if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art (PHOSITA) to which the claimed invention pertains. Obviousness is determined by considering:

1. The scope and content of the prior art.
2. The differences between the prior art and the claims at issue.
3. The level of ordinary skill in the pertinent art.
4. Secondary considerations of non-obviousness (e.g., commercial success, long-felt but unsolved needs, failure of others).

An obviousness rejection typically relies on disclosures that qualify as prior art under 35 U.S.C. § 102. For a combination of references to render a claim obvious, there must be some teaching, suggestion, or motivation in the prior art that would have led a PHOSITA to combine the references in the way claimed,...

### **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]**

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