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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. 12156508 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12156508 (the "12156508 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

Here is a concise summary of U.S. Patent 12,156,508.

Title: Pulley system allowing for passage of object attached to line

Assignee: Swift Paws Inc

Inventors: Meghan Wolfgram, John Ritter

Filing Date: April 11, 2022

Issue Date: December 3, 2024

Abstract:

A pulley system for enabling an object attached to a line to pass around a rotating pulley at least partially enclosed by a housing, without causing the object to encounter interference from the housing structure as the object passages through. An inward beveled edge of the housing structure may act to guide the line into the pulley groove. An object passthrough window for allowing the object to pass around the pulley while the pulley...

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 12156508 Patent:

Analysis of Prior Art for U.S. Patent No. 12,156,508

Based on the patent documentation for U.S. Patent No. 12,156,508, the following prior art reference was cited by the USPTO examiner during its prosecution.

U.S. Patent No. 3,405,478 A

- Full Citation: US 3,405,478 A
- Title: Toy cable car device
- Publication Date: October 15, 1968
- Filing Date: March 5, 1965
- Assignee: Lehmann Ernst Paul
- Brief Description: This patent describes a toy cable car system. The system includes a drive station and a reversing station, each with a pulley for a cable. A toy, such as a cable car, is attached to the cable. The pulleys are housed within casings that have openings to allow the cable to pass through. The housing is designed to guide the cable and prevent it from derailing from the pulleys.

Potential Anticipation Analysis:

This prior art reference is relevant to the general concept of a pulley system with a housing that guides a line. However, its potential to anticipate the specific claims of US 12,156,508 is limited.

- Claim 1 & 7: These claims require an "inwardly beveled pulley..."

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. 12,156,508

An analysis of U.S. Patent No. 12,156,508 suggests that its claims would have been obvious to a Person Having Ordinary Skill in the Art (POSITA) under 35 U.S.C. § 103 by combining the teachings of the cited prior art, U.S. Patent No. 3,405,478 A (Lehmann), with other well-known mechanical principles and devices that predate the '508 patent's priority date of December 17, 2013.

The central legal question in an obviousness analysis is whether a POSITA, aware of the relevant prior art, would have been motivated to combine existing elements to achieve the claimed invention with a reasonable expectation of success. The combination of familiar elements to yield predictable results is a primary indicator of obviousness.

The Lehmann patent discloses the foundational concept: a toy system with a line driven by a housed pulley to move an attached object (a cable car) around a course. The key limitations of the '508 patent not explicitly taught by Lehmann are (1) the "inwardly beveled pulley shield," (2) the "hinged" housing cover, and (3)...

4. Litigation History of the Patent

Public records reflect that the 12156508 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Zhende Tech et al. v. Swift Paws Inc — 26-1709 · Court of Appeals for the Federal Circuit · filed 2026-04-21 · Open

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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