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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 12185177 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12185177 (the "12185177 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's a concise summary of US Patent 12185177:

Title: Mashing mapping content displayed on mobile devices

Assignee: Nearby Systems LLC

Inventors: Gabriel Jakobson, Steven L. Rueben

Filing Date: February 8, 2024

Issue Date: December 31, 2024

Abstract: A method and apparatus are disclosed for mapping addressable information (such as locations, names, addresses, or landmarks) from various applications on a mobile device onto an existing map on that same device. When a user selects addressable information from an application (e.g., a website or email) and issues a mapping command, a map-display application (like Google Maps® or Waze®) is automatically presented, showing the newly...

## **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 12185177 Patent:

To identify the most relevant prior art for US patent 12185177, I will search the USPTO database for the patent and then examine its cited references.

## USPTO Search for US Patent 12185177

According to the provided patent text, the publication number for this patent is US12185177B2. I will use this to search the USPTO database.

The USPTO provides a "Patent Public Search" tool, and also allows searching through "Patent Center". When searching by patent number, leading zeros should be added if the number has fewer than 7 digits, to make it a 7-digit number. Since 12185177 has 8 digits, it can be entered as is.

## Prior Art Analysis for US Patent 12185177

The patent document itself lists "Prior art keywords" as "map, mapping, location, application, user" and states a "Prior art date" of 2007-10-12. The description explicitly mentions that the patent is a continuation-in-part of U.S. patent application Ser. No. 11/974,258, filed on Oct. 12, 2007, and incorporates its disclosures by reference. This application, and any patents it issued as, would be highly relevant prior art.

Let's...

### **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 US Patent 12185177 under 35 U.S.C. § 103

This analysis will focus on combinations of prior art that would render Claim 1 of US Patent 12185177 obvious to a person having ordinary skill in the art (PHOSITA). The effective filing date for US12185177B2 is October 12, 2007. Therefore, any prior art publicly available before this date is relevant for an obviousness analysis.

Independent Claim 1: A system for displaying location-based content on a digital map displayed on a mobile device, comprising:

- a memory of a mobile device storing a first non-browser application and a second non-browser application;

- a processor of the first mobile device executing the first non-browser application;

- a touch screen of the mobile device displaying a first user interface of the first non-browser application, wherein the first user interface is adapted to receive text corresponding to a location entered by a user;

- a mapping component transmitting the text to an online mapping service and receiving, in response, map data corresponding to the location, wherein the map data includes...

### **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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