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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. 12230394 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12230394 (the "12230394 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 12230394, titled "Barcode generation and implementation method and system for processing information," was granted on February 18, 2025, from an application filed on May 19, 2023. The sole inventor is Sean McKirdy, and the current assignee is Iscan2d Technologies LLC. The abstract describes a system and method for generating and implementing barcodes. A data generation device receives data and generates barcode data. A barcode generation device then creates a barcode based on this data, which is displayed on a display device. A barcode receiving device (e.g., a mobile device) receives the barcode and operates in response to the barcode data. The method involves generating barcode...

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 12230394 Patent:

To identify the most relevant prior art for US patent 12230394, I need to access the full patent document, specifically the "References Cited" section. The search results provided offer information on how to search the USPTO database but do not directly provide the cited prior art for US12230394. I can use the USPTO Patent Public Search to find this information.

I will proceed by searching the USPTO database for US12230394 and then extracting the cited

prior art from the patent document.

Due to the limitations of the current environment, I cannot directly access the USPTO Patent Public Search tool to perform a live search and retrieve the "References Cited" section for US12230394. Therefore, I cannot provide a detailed analysis of each prior art reference, including its full citation, publication/filing date, brief description, and which claims it potentially anticipates under 35 U.S.C. § 102.

To complete this task, one would typically:

1. Navigate to the USPTO Patent Public Search website.
2. Enter the patent number "12230394" in the search interface.
3. Access the full patent...

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:

I cannot perform an obviousness analysis of US Patent 12230394 under 35 U.S.C. § 103 as requested.

The provided patent text includes a "Prior art keywords" section (listing "mobile device", "data", "barcode", "user", "information"), but it does not list specific prior art references (e.g., patent numbers, academic papers, or other publications) that can be combined for an obviousness argument. Without specific prior art documents, it is not possible to identify combinations of references or explain the motivation for a person having ordinary skill in the art to combine them.

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.