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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. 12231703 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12231703 (the "12231703 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 12,231,703

A concise summary of U.S. Patent 12,231,703 is provided below, based on the available information as of April 26, 2026.

Title: Bitrate and pipeline preservation for content presentation

Assignee: OpenTV Inc

Inventors:

- Amarendra N. Gogoi
- Sanjay Kumar Gupta
- Ravikant Swami

Filing Date: October 4, 2023

Issue Date: February 18, 2025

Abstract:

Systems and methods for optimizing a content change process are provided. In example embodiments, a digital receiver causes playback of a first piece of content. The digital receiver receives a selection of a new piece of content for playback during the playback of the first piece of content. In response to the...

## 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 12231703 Patent:

Analysis of Prior Art for U.S. Patent 12,231,703

As a technical patent analyst on April 26, 2026, I have reviewed the citations listed for U.S. Patent 12,231,703 to identify the most relevant prior art. The following analysis details key references and their potential impact on the patent's claims under 35 U.S.C. § 102, which pertains to novelty.

The core invention of patent 12,231,703 is a method and system for reducing latency when a user switches between content streams on a digital receiver. This is achieved by:

1. Maintaining the bitrate of the previous content stream for the new stream.
2. Preserving all or part of the existing "playback pipeline" (source element, demultiplexer, audio/video decoders) if the new content is of the same type and uses compatible codecs.

Below is an examination of prior art references that could be considered to anticipate these claims.

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Key Prior Art and Potential Anticipation of Claims

1. U.S. Patent Application Publication No. US 2013/0329354 A1

- Full Citation: Systems and methods for achieving optimal digital video channel change...

## 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 12,231,703 under 35 U.S.C. § 103

This analysis, conducted on May 1, 2026, evaluates whether the invention claimed in U.S. Patent 12,231,703 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made. The analysis is based on the prior art references identified in the preceding section.

Under 35 U.S.C. § 103, a patent claim is invalid "if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art."

This involves considering the scope and content of the prior art, the differences between the prior art and the claims at issue, and the level of ordinary skill in the pertinent art. An obviousness rejection can be based on a combination of prior art references if there was a motivation to combine them.

The independent claims (1, 11, and 20) of patent 12,231,703 broadly cover a method and system for optimizing a content switch...

## 4. Litigation History of the Patent

Public records reflect that the 12231703 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- OpenTV, Inc. v. Pinterest, Inc. — 1:25-cv-01404 · U.S. District Court for the District of Delaware

· filed 2025-11-18 · Ongoing

## 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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