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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. 12265715 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12265715 (the "12265715 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

A comprehensive analysis of United States Patent 12,265,715 reveals a system for managing data storage with customizable operational policies. The patent, assigned to Gaea LLC, details a method for a storage device to handle data based on user-defined rules, offering flexibility in how data is stored and retrieved.

Patent Details:

- Title: Data storage device with configurable policy-based storage device behavior
- Assignee: Gaea LLC
- Inventors: Joshua Johnson, Curt Bruner, Jeffrey Reh, Christopher Squires, Brian Wilson
- Filing Date: January 10, 2024
- Issue Date: April 1, 2025
- Abstract: The patent describes an apparatus containing a storage device and a device controller. 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 12265715 Patent:

Based on an analysis of the claims and specification of U.S. Patent No. 12,265,715, the

following prior art references are identified as most relevant to the patent's claims of a storage device with a configurable, policy-based controller.

Note: The provided patent text for US 12,265,715 does not include a "References Cited" section, which would list the prior art considered by the USPTO examiner during prosecution. Therefore, this analysis is based on a search for technologically similar patents that would likely have been considered as relevant prior art.

Analysis of Key Prior Art

1. U.S. Patent 9,116,732 B1: "Storage device with internal data migration engine"

- Full Citation: US Patent 9,116,732 B1, "Storage device with internal data migration engine," issued to Western Digital Technologies, Inc.

- Filing Date: June 28, 2012

- Issue Date: August 25, 2015

- Brief Description: This patent describes a hybrid storage device, combining non-volatile semiconductor memory (like flash) and a magnetic disk into a single unit. The device includes an internal controller that...

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:

Based on the provided patent documents and the state of the art prior to the November 7, 2016 priority date, an analysis of U.S. Patent No. 12,265,715 ("the '715 patent") under 35 U.S.C. § 103 suggests that its claims may be rendered obvious by combining existing technologies and known principles.

A person having ordinary skill in the art (POSITA) at the time of the invention would likely have a degree in computer science or electrical engineering, coupled with several years of experience in storage system architecture, including knowledge of storage media (HDD, SSD), controller firmware, network protocols (Ethernet, TCP/IP), and distributed storage systems (e.g., object storage).

The core concept of the '715 patent is a data storage device with an intelligent, on-board device controller that uses a configurable policy to determine how and where to store data on its local media. This allows the drive itself to act as an independent, network-aware device capable of making trade-offs between storage density, reliability, and security, rather than being a simple block device managed...

4. Litigation History of the Patent

Public records reflect that the 12265715 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Gaea LLC v. [Defendant(s) To Be Confirmed] — 4:26-cv-00348 · U.S. District Court for the Northern District of Texas · Active

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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