

SAMPLE — NOT LEGAL ADVICE. This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[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. 12301627 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12301627 (the "12301627 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 No. 12,301,627

A detailed analysis of U.S. Patent No. 12,301,627 reveals a system and method for identifying and analyzing cybersecurity threats by correlating anomalous network events. The patent, assigned to Qomplx Inc., leverages both active and passive reconnaissance to build a comprehensive model of a network's normal behavior, which is then used to detect and trace the origins of cyberattacks.

Title: Correlating network event anomalies using active and passive external reconnaissance to identify attack information

Assignee: Qomplx Inc.

Inventors: Jason Crabtree, Andrew Sellers, Richard Kelley

Filing Date: September 20, 2024

Issue Date: May 13, 2025...

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 12301627 Patent:

An analysis of the prior art cited in U.S. Patent No. 12,301,627 reveals a landscape of

technologies that contribute to the foundation of cybersecurity and network analysis. While the full list of cited references was not available in the provided patent details, a thorough review of the patent's own description of related applications provides insight into the building blocks of the claimed invention. The '627 patent is a continuation of a long line of applications, indicating a development process that has integrated and built upon a wide range of technologies.

The core of the invention in U.S. Patent No. 12,301,627 lies in its comprehensive approach, which combines several key elements:

- Cyber-Physical Graph (CPG): A detailed and dynamic map of an organization's entire infrastructure, including not only network devices but also physical assets, users, and their interrelationships.
- Active and Passive Reconnaissance: The use of both internal and external data gathering to establish a baseline of normal network behavior.
- Behavioral Analytics: The identification of anomalies...

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:

Analysis of Obviousness of U.S. Patent No. 12,301,627 under 35 U.S.C. § 103

This analysis examines whether the claimed invention in U.S. Patent No. 12,301,627 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 patent's own detailed description and its relationship to prior art, particularly its extensive family of preceding patents.

Legal Standard for Obviousness

Under 35 U.S.C. § 103, a patent claim is invalid as obvious "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." The analysis requires 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. A key consideration is whether a PHOSITA would have had a reason or motivation to combine the teachings of the prior art references to arrive at the...

4. Litigation History of the Patent

Public records reflect that the 12301627 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Qomplx LLC v. Microsoft Corporation — 1:25-cv-01383 · U.S. District Court for the Western District of Texas · filed 2025-08-28 · active
- Qomplx LLC v. Palo Alto Networks, Inc. — 2:25-cv-00913 · U.S. District Court for the Eastern District of Texas · filed 2025-08-28 · 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]

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.

Generated May 14, 2026 by ihatepatenttrolls.com — sample only.