

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. 12301628 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12301628 (the "12301628 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

Patent Analysis: US 12,301,628 B2

Date of Analysis: April 26, 2026

Patent Number: US 12,301,628 B2

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

Abstract:

The invention provides a system and method for correlating network event anomalies to identify attack information. This involves creating a cyber-physical graph of an organization, which maps entities and their relationships. A reconnaissance engine performs searches using this graph and applies the results to create a...

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 12301628 Patent:

To provide a thorough analysis of the prior art for U.S. Patent No. 12,301,628, I will first need to locate the "References Cited" section of the patent. This information is typically available through the United States Patent and Trademark Office (USPTO) Public Patent Application Information Retrieval (PAIR) system or other public patent databases.

I will now proceed to find this information.

Analysis of Prior Art for U.S. Patent No. 12,301,628

Below is an analysis of the prior art references cited during the prosecution of U.S. Patent No. 12,301,628. This analysis is based on the information available in the patent's file wrapper. Each reference is detailed with its publication information, a brief description, and a preliminary assessment of the claims it may anticipate.

U.S. Patent Documents Cited

Citation Number	Publication Date	Patentee	Title	Potential Anticipation of Claims
-----------------	------------------	----------	-------	----------------------------------

:---	:---	:---	:---	:---
------	------	------	------	------

US 10,210,255 B2	Feb. 19, 2019	Crabtree, et al.	System and method for an advanced cyber-decision platform using a distributed computational...	
------------------	---------------	------------------	--	--

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:

Here is a detailed analysis of the obviousness of US Patent 12,301,628 under 35 U.S.C. § 103, based on the provided prior art.

Obviousness Analysis of U.S. Patent 12,301,628

Standard for Obviousness (35 U.S.C. § 103): A patent claim is invalid for obviousness if the differences between the claimed invention 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 (a "POSA").

Person Having Ordinary Skill in the Art (POSA): For the purposes of this analysis, a POSA is considered to have a bachelor's degree in computer science, computer engineering, or a related field, along with several years of experience in network security, intrusion detection systems, and data analysis. This individual would be familiar with graph theory, machine learning concepts for anomaly detection, and standard security investigation techniques.

Analysis of Independent Claim 1 (Method)

Claim 1 recites a multi-step method for identifying attack information. We will analyze how combinations of the...

4. Litigation History of the Patent

Public records reflect that the 12301628 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, Austin Division · filed 2025-08-28 · Open
- 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 ihatepatentrolls.com — sample only.