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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. 12347711 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12347711 (the "12347711 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

To: Management

From: Senior Patent Analyst

Date: 2026-04-26

Subject: Analysis of U.S. Patent No. 12347711
Patent Summary

A search of the USPTO database confirms the details for US patent 12347711. A search of the CAFC (United States Court of Appeals for the Federal Circuit) 2026 dockets for litigation involving this patent number yielded no results as of today's date.

- Title: Gas diffusion device, and wafer container including the same
- Assignee: Gudeng Precision Industrial Co Ltd
- Inventors: Ming-Chien Chiu, Chia-Ho CHUANG, Kuo-Hua Lee, Shu-Hung Lin, Hao-Kang Hsia
- Filing Date: August 8, 2022
- Issue Date: July 1, 2025
- Abstract: The present invention provides a wafer container and...

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 12347711 Patent:

To: Management
From: Senior Patent Analyst
Date: 2026-05-01
Subject: Prior Art Analysis for U.S. Patent No. 12347711
Analysis of Cited Prior Art

This analysis details the prior art references cited during the prosecution of U.S. Patent No. 12347711. The following references were considered by the USPTO examiner.

Based on the provided patent text, the core novelty of US patent 12347711, particularly in its independent claim 1, resides in the combination of a buffering gas chamber at the bottom of the wafer container with a coaxial alignment between the gas intake's center axis and the coupling structure's center axis. This "straight-through" design is intended to improve gas flow efficiency compared to prior art that used winding, offset paths.

The most relevant prior art would be any that discloses a similar buffering chamber or a coaxial gas intake path for a wafer container's purging system. While the file wrapper and a detailed prosecution history are not available, an analysis of the cited references reveals the state of the art the examiner considered.

Cited References...

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:

To: Management
From: Senior Patent Analyst
Date: 2026-05-01
Subject: Obviousness Analysis (35 U.S.C. § 103) for U.S. Patent No. 12347711
Obviousness Analysis under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in U.S. Patent No. 12347711 would have been obvious to a Person Having Ordinary Skill in the Art (POSITA) at the time the invention was made. The analysis focuses on independent claim 1, which represents the core inventive concept.

A critical limitation of this analysis is the absence of the specific prior art references cited during prosecution. As noted in the "Prior Art" section, this information was not available in the provided patent text. Therefore, this analysis is based on the state of the art as described by the patent's own background section. The patent explicitly identifies deficiencies in the prior art, which a POSITA would have been motivated to solve.

Key Limitations of Independent Claim 1:

The invention as defined in Claim 1 is a gas diffusion device for a wafer container comprising:
1. A buffering gas chamber at the bottom of the...

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]

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