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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. 12406663 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12406663 (the "12406663 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

Analysis of U.S. Patent 12,406,663

Washington, D.C. - An analysis of United States Patent 12,406,663, titled "Routing of user commands across disparate ecosystems," reveals a system for integrating voice commands from a vehicle with various smart home or Internet of Things (IoT) ecosystems. The patent, issued to Cerence Operating Co., outlines a method for a vehicle's assistant to intelligently route user commands to the correct external system, such as a home automation platform.

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| Patent Number | 12,406,663 |

| Title | Routing of user commands across disparate ecosystems |

| Assignee | Cerence Operating Co. |

| Inventors | Prateek Kathpal, Brian Arthur Rubin |

| Filing...

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 12406663 Patent:

Analysis of Prior Art for U.S. Patent 12,406,663

Under 35 U.S.C. § 102, an invention cannot be patented if it was already patented, described in a printed publication, or in public use, on sale, or otherwise available to the public before the effective filing date of the claimed invention. For U.S. Patent 12,406,663, with a priority date of December 21, 2020, any relevant prior art must predate this. The following patents, cited as prior art during the examination of the '663 patent, are considered most relevant.

1. U.S. Patent 9,734,839 B1: "Routing natural language commands to the appropriate applications"

- Full Citation: US Patent 9,734,839 B1
- Assignee: Amazon Technologies, Inc.
- Publication Date: August 15, 2017
- Filing Date: June 20, 2012
- Brief Description: This patent discloses a system that receives a natural language command and routes it to an appropriate application for execution. It describes a "routing manager" that analyzes the user's utterance to determine the user's intent and selects a third-party application to handle the command. The system can use...

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 12,406,663 under 35 U.S.C. § 103

Washington, D.C. - An analysis of the claims of U.S. Patent 12,406,663 ("the '663 patent") in light of prior art available before its priority date of December 21, 2020, indicates that the claims may be rendered obvious under 35 U.S.C. § 103. The analysis centers on the combination of known elements from separate prior art references which, when combined, appear to teach all elements of the independent claims of the '663 patent. A person having ordinary skill in the art (PHOSITA) in the fields of in-vehicle infotainment, voice recognition, and IoT device control would have been motivated to combine these teachings to achieve a predictable result.

The core inventive concept of the '663 patent is a system within a vehicle that uses natural language understanding (NLU) and contextual data (e.g., vehicle location) to interpret a user's voice command and route it to the correct external smart home or IoT ecosystem. The system then uses feedback from that ecosystem to improve its NLU models.

Several combinations of...

4. Litigation History of the Patent

Public records reflect that the 12406663 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Cerence Operating Company v. Amazon.com, Inc. et al. — 2:26-cv-00373 · U.S. District Court for the Eastern District of Texas · filed 2026-05-04 · initial stages

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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