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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. 12452192 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12452192 (the "12452192 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

Here is a concise summary of US Patent 12,452,192.

Title: Systems and methods for providing a global virtual network (GVN)

Assignee: UMBRA Technologies Ltd.

Inventors: Joseph E. Rubenstein, Carlos Eduardo Ore, Thibaud August Bernard Jean Saint-Martin, Fred Broussard, and Jorn Allen Dose Knutsen

Filing Date: May 12, 2025

Issue Date: October 21, 2025

Abstract: Systems and methods for managing a global virtual network connection between an endpoint device and an access point server are disclosed. In one embodiment the network system may include an endpoint device, an access point server, and a control server. The endpoint device and the access point server may be connected with a first...

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 12452192 Patent:

Prior Art Analysis for US Patent 12,452,192

Based on a review of patent citations for US 12,452,192, the following references are identified

as relevant prior art. The analysis focuses on the potential for anticipation under 35 U.S.C. § 102, which requires a single prior art reference to disclose every element of a claimed invention. The key inventive concept of patent '192 revolves around a control server that monitors access point servers, creates a performance-based ranked list, and provides this list to an endpoint device for optimized tunnel creation.

1. US Patent 9,237,492 B2 (Akamai Technologies)

- Full Citation: US 9,237,492 B2, "System and method for selecting a name server," filed Dec 19, 2013; issued Jan 12, 2016. Assignee: Akamai Technologies, Inc.
- Brief Description: This patent describes a system for optimizing Domain Name System (DNS) resolution. It involves clients measuring the performance of different name servers (e.g., by testing for latency or packet loss) and reporting this data back to a central "mapping" system. This central system aggregates the...

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 US Patent 12,452,192 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in US Patent 12,452,192 would have been obvious to a person having ordinary skill in the art at the time of the invention. The analysis is based on combinations of the prior art references identified in the preceding section.

A person having ordinary skill in the art (PHOSITA) in the relevant field of computer networking and network optimization as of the patent's priority date (April 7, 2015) would possess a Bachelor's degree in Computer Science or a related discipline, coupled with several years of industry experience. This experience would include designing or managing wide-area networks (WANs), virtual private networks (VPNs), and understanding network performance metrics and optimization techniques like load balancing and dynamic routing.

The core concept of the independent claims (1, 8, and 15) of patent '192 is a system where a central control server monitors the performance of various access point servers, creates a ranked list based on these...

4. Litigation History of the Patent

Public records reflect that the 12452192 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Umbra Technologies Ltd. v. Zscaler, Inc. — 2:25-cv-01063 · U.S. District Court for the Eastern 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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