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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. 12491430 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12491430 (the "12491430 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 12,491,430: Puzzle Platform

Date of Analysis: 2026-05-13

A review of U.S. Patent 12,491,430, titled "Puzzle platform," has been conducted. As of this date, no records of litigation involving this patent have been identified in the 2026 dockets of the U.S. Court of Appeals for the Federal Circuit (CAFC).

I. Key Patent Information

- Title: Puzzle platform
- Patent Number: 12,491,430 (also cited as US12491430B2)
- Assignee: Individual
- Inventor: Xiaoling CHE
- Filing Date: January 7, 2025
- Issue Date: December 9, 2025
- Priority Date: The patent claims priority to multiple earlier applications, with the earliest listed as September 26, 2021.
- Abstract: The patent...

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 12491430 Patent:

Analysis of Prior Art for U.S. Patent No. 12,491,430

Date of Analysis: 2026-05-13

Subject Patent: US 12,491,430 B2

Title: Puzzle platform

Filing Date: 2025-01-07

Publication Date: 2025-12-09

Core Inventive Concept of US 12,491,430: The patent describes a puzzle platform featuring a multi-functional support system. The platform includes a puzzle board with a main puzzle plate and integrated puzzle drawers beneath it. The novelty appears to lie in the combination of two distinct support mechanisms: a kickstand that allows the board to be propped up at an incline, and a separate rotating device (akin to a lazy Susan) that allows the entire board to be rotated 360 degrees when lying flat. The system is designed so that these two functions are mutually exclusive: when the kickstand is in use, the rotating device is in a non-working, inclined state; when the board is flat and using the rotating device, the kickstand is in a non-working, closed position. The claims likely focus on the structural arrangement and spatial relationship between the kickstand and the rotating device.

Based on...

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 for US Patent 12,491,430 under 35 U.S.C. § 103

Date of Analysis: May 13, 2026

Patent under Review: US Patent 12,491,430 B2 (henceforth '430 patent)

Invention: A puzzle platform comprising a puzzle board with a puzzle plate and at least one drawer, a kickstand to support the board at an incline, and a separate rotating device to allow the board to be rotated when not supported by the kickstand.

I. Understanding the '430 Patent Claims

The core of the '430 patent, as detailed in its abstract and claims, is a puzzle platform with two distinct operational modes.

1. Tilted Mode: A kickstand supports the puzzle board, inclining the puzzle plate and drawers for ergonomic use. In this mode, the rotating device is in a "non-working state."

2. Rotating Mode: The kickstand is in a "non-working state" (e.g., closed), and the puzzle board can be rotated on a flat surface via a rotating device, such as a Lazy Susan.

The claims also describe various configurations, such as the spatial relationship between the kickstand and the rotating device, including embodiments...

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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