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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. 12496077 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 12496077 (the "12496077 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**

An analysis of U.S. Patent 12,496,077 has been conducted based on the provided documentation.

Summary of U.S. Patent 12,496,077

- Title: Systems and methods for removing undesirable material within a circulatory system
- Assignee: Angiodynamics Inc
- Inventors: Kevin Swift, Seth Cote, Mark Girard
- Filing Date: June 30, 2025
- Issue Date: December 16, 2025
- Abstract: The invention provides systems and methods for the removal of undesirable materials, such as blood clots, from vessels. It focuses on using at least one cannula to remove the material "substantially en bloc" (i.e., in one piece), thereby avoiding fragmentation, while minimizing fluid loss to the patient.

Plain-Language...

## **4. Litigation History of the Patent**

Public records reflect that the 12496077 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Angiodynamics Inc v. Endovascular Engineering Inc — 1:26-cv-00469 · Delaware District Court · filed 2026-04-23 · Open

### 3. 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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