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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. 6185590 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 6185590 (the "6185590 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

U.S. Patent 6,185,590: A System for Universal Software Component Management
Washington, D.C. - A detailed analysis of United States Patent number 6,185,590, issued on February 6, 2001, reveals a system and method for creating a standardized framework to manage diverse software components, referred to as "engines," in a distributed computing environment. This "component factory" approach aims to simplify the use of complex, low-level software technologies by a broader range of developers.

Key Patent Details:

- Title: Process and architecture for use on stand-alone machine and in distributed computer architecture for client server and/or intranet and/or internet operating environments.

- ...

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 6185590 Patent:

I have successfully searched the USPTO database for US Patent 6,185,590. Now I need to identify the "Cited Documents" or "References Cited" section within the patent information to find the prior art references. Once I have the list of cited patents, I will proceed to find the full

citation, publication/filing date for each, and then analyze them to provide a brief description and determine which claims of US 6,185,590 they potentially anticipate. I will perform this for each cited patent individually.

First, I need to obtain the list of patents that are cited by US Patent 6,185,590. I will now search for this information. To accurately analyze the prior art for U.S. Patent 6,185,590, it is necessary to identify the patents and other documents that were cited during its examination by the U.S. Patent and Trademark Office (USPTO). This information is contained within the "References Cited" section of the patent's file wrapper. Based on a review of the patent documentation, the following prior art references are most relevant:

Analysis of Prior Art Cited in U.S. Patent 6,185,590...

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 6,185,590 under 35 U.S.C. § 103

This analysis evaluates the claims of U.S. Patent 6,185,590 ("the '590 patent") for obviousness in light of the prior art cited during its prosecution. The standard for obviousness under 35 U.S.C. § 103 is whether the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). For this patent, filed in 1997, a PHOSITA would be a software engineer with experience in object-oriented programming (e.g., C++), component-based architectures (like COM/DCOM), and developing for networked or client-server environments.

I. Analysis of Claims 1, 11, and 18: The Component Architecture

These claims are directed to a method and architecture for creating a standardized, multi-layered interface for diverse software "engines" (e.g., OCR, barcode readers) by migrating their unique APIs to a generic format.

Obviousness Combination: The subject matter of claims 1, 11,...

4. Litigation History of the Patent

Public records reflect that the 6185590 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- MPHJ Technology Investments, LLC v. D-Link Systems, Inc. — 3:12-cv-02996 · U.S. District Court for the Southern District of California · filed 2012-12-11 · terminated
- MPHJ Technology Investments, LLC v. Lexmark International, Inc. — 3:12-cv-03031 · U.S. District Court for the Southern District of California · filed 2012-12-17 · terminated
- MPHJ Technology Investments, LLC v. The Coca-Cola Company — 1:13-cv-00826 · U.S. District Court for the District of Delaware · filed 2013-05-03 · voluntarily dismissed
- MPHJ Technology Investments, LLC v. J.C. Penney Company, Inc. — 2:13-cv-00345 · U.S. District Court for the Eastern District of Texas · filed 2013-05-14 · dismissed
- MPHJ Technology Investments, LLC v. GBCblue — 2:13-cv-00170 · U.S. District Court for the District of Vermont · filed 2013-06-21 · dismissed

• MPHJ Technology Investments, LLC v. Ricoh Americas Holdings, Inc. — 1:13-cv-00827 · U.S. District Court for the District of Delaware · filed 2013-05-03 · voluntarily dismissed

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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