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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. 6314420 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 6314420 (the "6314420 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 No. 6,314,420

Date of Analysis: April 26, 2026

An analysis of United States Patent 6,314,420, titled "Collaborative/adaptive search engine," has been conducted based on information from the U.S. Patent and Trademark Office (USPTO) and a review of its claims. A search of the 2026 dockets for the Court of Appeals for the Federal Circuit (CAFC) revealed no pending litigation specifically involving this patent.

Patent Overview

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| Title | Collaborative/adaptive search engine |

| Assignee | I/P Engine Inc (Current Assignee); Lycos Inc (Original Assignee) |

| Inventors | Andrew K. Lang, Donald M. Kosak |

| Filing Date | December 3, 1998 |

| Issue...

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 6314420 Patent:

Analysis of Prior Art for U.S. Patent 6,314,420

As a senior patent analyst, I have reviewed the citations for US Patent 6,314,420 ("the '420 patent"). The patent's core invention, as defined by its independent claims 1 and 9, is a search engine system that can perform two types of searches: a standard, immediate "demand" search, and a continuous, long-term "wire" search. For at least the "wire" searches, the system combines content-based filtering with collaborative feedback from other users to improve and rank results over time.

While the claims of the '420 patent were ultimately invalidated for obviousness under 35 U.S.C. § 103 (meaning the invention would have been an obvious combination of existing technologies to a person of ordinary skill), this analysis focuses on potential anticipation under 35 U.S.C. § 102, which requires a single prior art reference to disclose every element of a claim.

The most relevant prior art references cited in the '420 patent are detailed below.

Key Prior Art References

1. U.S. Patent 5,867,799 A (The Parent Patent)

• Full Citation: US...

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:

As of today's date, 2026-05-11, the asserted claims of US Patent 6,314,420 are considered invalid due to obviousness under 35 U.S.C. § 103. This conclusion is not speculative; it is based on the binding legal precedent set by the U.S. Court of Appeals for the Federal Circuit in the case *I/P Engine, Inc. v. AOL, Inc., et al.* (Appeal No. 2013-1307), which reversed a district court judgment and found the patent's claims invalid.

This analysis reconstructs the reasoning for that invalidity by examining key prior art references and the motivation to combine them that would have been apparent to a person of ordinary skill in the art (PHOSITA) at the time of the invention (priority date: April 4, 1996).

Person Having Ordinary Skill in the Art (PHOSITA)

A PHOSITA in early 1996 would have possessed a bachelor's degree in computer science or a related field, along with practical experience in information retrieval, database systems, and early Internet technologies. This individual would have been familiar with the limitations of first-generation, purely keyword-based search engines and...

4. Litigation History of the Patent

Public records reflect that the 6314420 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• *I/P Engine, Inc. v. AOL, Inc. et al.* — 2:2011cv00512 · U.S. District Court for the Eastern District of Virginia · filed 2011-09-15 · Reversed on appeal

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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