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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. 6813742 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 6813742 (the "6813742 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

Patent Summary: US 6,813,742 B2

Title: High speed turbo codes decoder for 3G using pipelined SISO log-map decoders architecture

Assignee: TurboCode LLC

Inventor: Quang Nguyen

Filing Date: January 2, 2001

Issue Date: November 2, 2004

Abstract:

A Baseband Processor for Wireless Communications is presented. The invention encompasses several improved Turbo codes method to provide a more practical and simpler method for implementation a Turbo Codes Decoder in ASIC or DSP coding. (1) A plurality of pipelined Log-MAP decoders are used for iterative decoding of received data. (2) In a pipeline mode, Decoder A decodes data from the De-interleaver RAM memory while the Decoder B decodes data...

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 6813742 Patent:

Prior Art Analysis for U.S. Patent 6,813,742

The following analysis details prior art cited during the prosecution of U.S. Patent 6,813,742. Each reference is evaluated for its potential to anticipate the claims of the '742 patent under 35 U.S.C. § 102. The analysis focuses primarily on independent claims 1 and 6, which define the core inventive concepts of the patent.

The '742 patent describes a turbo code decoder architecture using two or more soft-in/soft-out (SISO) Log-Maximum a Posteriori (Log-MAP) decoders in a pipelined, circular, and iterative configuration to improve decoding speed and efficiency for 3G wireless communications.

Cited Patent References

1. U.S. Patent 5,446,747 - "Error-correction coding method with at least two systematic convolutional codings in parallel, corresponding iterative decoding method, decoding module and decoder"

- Full Citation: US Patent 5,446,747, issued to France Telecom.
- Filing Date: April 23, 1991.
- Brief Description: This patent is foundational to turbo codes. It describes a decoding process that uses two or more elementary decoders...

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 6,813,742 under 35 U.S.C. § 103

This analysis evaluates the obviousness of the independent claims of U.S. Patent 6,813,742 ('742 patent) in light of the prior art cited during its prosecution. The standard for obviousness under 35 U.S.C. § 103 is whether 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 (a "POSA"). This analysis focuses on whether a POSA would have been motivated to combine the teachings of the existing prior art to arrive at the invention claimed in the '742 patent.

The core of the '742 patent, as defined in independent claims 1 and 6, is a turbo decoder architecture for 3G wireless systems that uses at least two soft-in/soft-out (SISO) decoders in a serially-coupled, circular, and iterative configuration. The key features are the iterative feedback loop and the use of MAP (or Log-MAP) algorithms to process soft decision information.

A person of ordinary skill in the art at the time of the invention (priority date of January 2, 2001) would...

4. Litigation History of the Patent

Public records reflect that the 6813742 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- TurboCode LLC v. TCL Technology — 1:22-cv-01163 · Western District of Texas · Dismissed with prejudice
- TurboCode LLC v. Dell Technologies Inc. et al — 6:21-cv-00359 · Western District of Texas · filed 2021-04-12 · Status not specified
- TurboCode LLC v. BEC Technologies, Inc. — 4:24-cv-00357 · Eastern District of Texas · filed 2024-04-25 · Voluntarily dismissed with prejudice

- TurboCode LLC v. Advantech Co., Ltd. — 4:24-cv-00524 · Eastern District of Texas · filed 2024-06-07 · Status not specified
- TurboCode LLC v. Ceragon Networks, Inc. — Eastern District of Texas · Terminated

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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