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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 6950469 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 6950469 (the "6950469 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

Here's a concise summary of US Patent 6950469:

US Patent 6,950,469

- Title: Method for sub-pixel value interpolation
- Assignee: Nokia Technologies Oy (Current Assignee), Nokia Inc (Original Assignee)
- Inventors: Marta Karczewicz, Antti Olli Hallapuro
- Filing Date: September 17, 2001
- Issue Date: September 27, 2005
- Abstract: The patent describes a method for sub-pixel value interpolation used in encoding and decoding data, particularly digital video. It aims to reduce computational complexity and memory usage compared to prior art methods. The method involves interpolating sub-pixel values at various fractional horizontal and vertical locations (e.g., 1/2, 1/4, 1/8 pixel resolutions)...

## 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 6950469 Patent:

US Patent 6950469, titled "Method for sub-pixel value interpolation," addresses techniques for generating sub-pixel values in digital video encoding and decoding. The patent aims to improve

upon existing methods like TML5 and TML6, which suffered from issues such as increased memory usage, computational complexity, and reduced precision due to intermediate truncation and clipping operations. The core of US6950469's invention lies in specific interpolation schemes for various sub-pixel resolutions (e.g., half and quarter-pixel locations) that minimize these drawbacks, particularly by direct interpolation using weighted sums and diagonal averaging. The priority date for US6950469 is 2001-09-17.

Based on a review of the patent citations listed for US6950469 and their publication dates prior to its priority date, the following are identified as the most relevant prior art.

Most Relevant Prior Art for US6950469:

1. US5594813A

Full Citation: US5594813A, Fandrianto et al., "Method and apparatus for video compression using motion compensation with sub-pixel resolution"....

### **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:

US patent 6950469, titled "Method for sub-pixel value interpolation," relates to techniques for interpolating sub-pixel values in video encoding and decoding processes, particularly for digital video [cite: the present invention relates to a method for sub-pixel value interpolation in the encoding and decoding of data. It relates particularly, but not exclusively, to encoding and decoding of digital video.]. The patent aims to improve upon existing interpolation methods, such as those described in Test Model 5 (TML5) and Test Model 6 (TML6) of video coding standards, by offering a more efficient balance between computational complexity, memory usage, and image quality.

For an obviousness analysis under 35 U.S.C. § 103, we identify combinations of prior art references that would have motivated a person having ordinary skill in the art (PHOSITA) to arrive at the claimed invention.

Summary of the Invention (US6950469):

The primary inventive aspect disclosed in US6950469, as described in the "first aspect of the invention," is a method of interpolation for generating sub-pixel values...

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

Public records reflect that the 6950469 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Nokia Technologies Oy v. Warner Bros. Entertainment Inc. et al. — 1:25-cv-01337 · U.S. District Court for the District of Delaware · filed 2025-11-01 · Ongoing
- Inv. No. 337-TA-1208 — 337-TA-1208 · International Trade Commission · filed 2020-07-01 · Terminated
- Amazon Com Inc. et al. v. Nokia Technologies Oy — IPR2024-01139 · Patent Trial and Appeal Board (PTAB) · filed 2024-07-05 · Settlement
- Unified Patents, LLC v. Nokia Technologies Oy — IPR2020-01685 · Patent Trial and Appeal Board (PTAB) · Settlement
- Nokia Technologies Oy v. HP, Inc. — 1:23-cv-01236 · U.S. District Court for the District of

Delaware · filed 2023-10-31 · Active/Pending

• Nokia Tech Oy v. Paramount Skydance Corp et al. — 1:25-cv-01054 · District of Delaware · filed 2025-08-21 · Dismissed (Settled)

## 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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