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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. 6968001 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 6968001 (the "6968001 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

US Patent 6968001: Communication Receiver with Virtual Parallel Equalizers

Title: Communication receiver with virtual parallel equalizers

Current Assignee: Qualcomm Inc.

Inventors:

- Srikant Jayaraman
- Ivan Jesus Fernandez Corbaton
- John E. Smee
- Michael A. Howard

Filing Date: August 21, 2002

Issue Date: November 22, 2005

Abstract:

The patent describes a method for optimizing an equalizer in a communication system receiver by utilizing "virtual parallel equalizers." This involves applying multiple configurations for training a single equalizer and then determining a performance measurement or estimate for each configuration. By comparing these performance measures, the optimum...

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 6968001 Patent:

To identify the most relevant prior art for US patent 6968001, I will examine the "Citations" and "Family Cites Families" sections of the provided patent text, as these typically list the prior art considered during prosecution. The information regarding publication/filing date and a brief description is provided within the patent text itself. I will then cross-reference these against the independent claims to determine potential anticipation under 35 U.S.C. § 102.

Cited Prior Art for US Patent 6968001:

Here are the patent citations listed in US6968001, along with their relevant details and potential anticipation:

Patent Citations (Directly cited by US6968001):

1. US5268930A

Full Citation: US5268930A (en)

Publication Date: 1993-12-07

Priority Date: 1991-12-19

Assignee: Novatel Communications Ltd.

Title: Decision feedback equalizer

Brief Description: This patent describes a decision feedback equalizer. Decision Feedback Equalizers (DFE) are a type of equalizer that uses previously detected symbols to help cancel intersymbol interference (ISI) from currently received...

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 under 35 U.S.C. § 103

This analysis identifies combinations of prior art that would render the claims of US patent 6968001 obvious to a person having ordinary skill in the art (PHOSITA). The motivation to combine these references would stem from the desire to improve equalizer performance, adaptability, and efficiency in communication systems, especially in the context of time-varying channels and variable data rates.

A PHOSITA in the field of communication systems equalization would have a strong understanding of adaptive filters, various equalizer structures (e.g., FIR, DFE), performance metrics (e.g., MSE, C/I, SINR), and the challenges of optimizing equalizer performance in dynamic environments. They would also be aware of the trade-offs between equalizer length, adaptation speed, and steady-state performance.

Combination 1: US5666378A in view of US5268930A and general knowledge of adaptive equalizers.

This combination would render obvious the method and apparatus claims (Claims 1, 11, 12, 13, and 15) related to training an equalizer with different...

4. Litigation History of the Patent

Public records reflect that the 6968001 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

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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