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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. 7069287 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7069287 (the "7069287 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 7,069,287

Washington, D.C. - A detailed analysis of United States Patent 7,069,287 reveals a method for improving the efficiency of cryptographic computations on microprocessors with limited capabilities, particularly those found in devices like smart cards. The patent, issued on June 27, 2006, addresses the computational bottleneck often encountered in finite field arithmetic, a cornerstone of modern public-key cryptography.

The patent is officially titled "Method for efficient computation of odd characteristic extension fields." It was assigned to the Worcester Polytechnic Institute. The inventors listed are Christof Paar, Adam D. Woodbury, and Daniel V. Bailey....

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 7069287 Patent:

Analysis of Prior Art for U.S. Patent 7,069,287

The core innovation protected by U.S. Patent 7,069,287, particularly in independent claims 1 and 11, is a method and system for finite field multiplication that improves efficiency on resource-constrained microcontrollers. This is achieved by first computing and summing multiple

intermediate products without performing a modular reduction after each step, and only then performing a single modular reduction on the accumulated sum. This "add-first, reduce-later" approach is contrasted with the conventional method of performing a reduction after each multiplication.

The following is an analysis of the prior art cited on the face of patent 7,069,287, evaluating each reference's potential to anticipate the claims under 35 U.S.C. § 102.

U.S. Patent 6,049,815 A: Method and apparatus for finite field multiplication

- Full Citation: U.S. Patent 6,049,815 A, "Method and apparatus for finite field multiplication," assigned to Certicom Corp.
- Publication/Filing Date: Published April 11, 2000. Filed December 30, 1996.
- Brief Description:...

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 7,069,287 under 35 U.S.C. § 103

An analysis of U.S. Patent 7,069,287 under 35 U.S.C. § 103 suggests that the invention claimed, particularly the "add-first, reduce-later" method of finite field multiplication, would likely have been considered non-obvious to a person having ordinary skill in the art at the time of the invention. While the cited prior art addresses the general problem of efficient finite field multiplication, none of the references, either individually or in combination, appear to suggest the specific approach that is central to this patent.

The legal framework for obviousness, established in *Graham v. John Deere Co.*, requires a factual inquiry into the scope of the prior art, the differences between the art and the claims, and the level of ordinary skill. The Supreme Court's later decision in *KSR Int'l Co. v. Teleflex Inc.* added flexibility, allowing for a "common sense" approach and recognizing that a motivation to combine prior art can arise from various sources, including market pressures and the nature of the problem itself....

4. 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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