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[Your Name]

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[Street Address, City, State ZIP]

May 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

**Re: U.S. Patent No. 7193986 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7193986 (the "7193986 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**

Summary of U.S. Patent 7,193,986

Title: Wireless network medium access control protocol

Assignee: Arlington Technologies, LLC (current) / Nortel Networks Ltd. (at time of issue)

Inventors: William Giles Scanlon, Tze-Yeung Chui

Filing Date: May 30, 2002

Issue Date: March 20, 2007

Abstract:

A device for use in a packet-oriented transmission network comprises a transmitter arranged to transmit a sequence comprising at least one data packet and a receiver arranged to receive a sequence comprising at least one data packet. At least one data packet in one of the transmitted or received sequence of data packets includes at least one pointer to indicate when a designated data packet in the...

## **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 7193986 Patent:

Analysis of Prior Art for U.S. Patent 7,193,986

This analysis covers the prior art references cited by the USPTO examiner during the original prosecution of U.S. Patent 7,193,986. The core of the invention in the '986 patent, particularly in independent claims 1 and 9, is a master-slave wireless network where some data packets transmitted by the master contain a pointer. This pointer indicates the relative time remaining until a special "designated packet" (e.g., a beacon) is transmitted. The designated packet, in turn, contains scheduling information for the slave devices, telling them when to transmit. This mechanism is designed to allow slave devices to quickly synchronize and save power by sleeping until the next designated packet.

The following five references were considered by the examiner.

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1. U.S. Patent 6,088,337 A

- Full Citation: "Method access point device and peripheral for providing space diversity in a time division duplex wireless system." Assignee: Motorola, Inc.
- Dates: Filed: October 20, 1997. Published: July 11, 2000.
- Brief Description: This patent...

### **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 7,193,986 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in U.S. Patent 7,193,986 ('986 patent) would have been obvious to a person having ordinary skill in the art (POSITA) at the time the invention was made, circa 2002. A POSITA is considered to have a degree in electrical engineering or computer science and several years of experience designing wireless network protocols, specifically at the Medium Access Control (MAC) layer.

The central inventive concept of the '986 patent, as defined in independent claims 1 and 9, is a master-slave wireless network where the master device embeds a pointer into at least some of its regular data packets. This pointer indicates the relative time remaining until a "designated packet" (e.g., a broadcast beacon) is transmitted. This designated packet contains scheduling information that tells participating slave devices when they are cleared to transmit. The primary benefits articulated in the patent are improved power efficiency and faster re-synchronization for slave devices.

The...

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

Public records reflect that the 7193986 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Arlington Technologies, LLC v. T-Mobile US, Inc. et al. — 2:25-cv-00279 · U.S. District Court for the Eastern District of Texas · filed 2025-03-07 · Ongoing
- Arlington Technologies, LLC v. Comcast Cable Communications, LLC — U.S. District Court for the Eastern District of Texas · 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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