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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. 7238550 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7238550 (the "7238550 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 7238550:
Title: Methods and apparatus for fabricating Chip-on-Board modules
Current Assignee: Helix Micro Innovations LLC (as of 2024-05-30)
Inventors: Charles I. Peddle
Filing Date: February 20, 2003 (Application number US10/371,800)
Issue Date: July 3, 2007
Abstract: An improved method for fabricating Chip-on-Board memory modules uses partially-defective or a combination of partially-defective and flawless memory chips. This method involves mounting unpackaged (or a combination of packaged and unpackaged) memory parts onto a printed circuit board using one or more selectively settable materials. The memory parts are then tested and patched. A…

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 7238550 Patent:

To identify the most relevant prior art for US patent 7238550, I will examine the "Patent Citations" section of the patent document. This section lists patents that were cited by the

examiner or by third parties during the prosecution of US7238550.
Here is an analysis of the most relevant prior art cited in US7238550:
Most Relevant Prior Art for US7238550
1. US6119049A
Full Citation: US6119049A - Memory module assembly using partially defective chips.
Publication/Filing Date: Publication Date: September 12, 2000; Filing Date: August 12, 1996.
Brief Description: This patent describes a memory module assembly that utilizes partially defective memory chips. It focuses on methods for patching these defective chips to create a functional module. The patent is directly referenced multiple times within US7238550, particularly in the context of patching processes for Chip-on-Board modules.
Potential Anticipation (35 U.S.C. § 102): US6119049A potentially anticipates elements of claims related to using partially defective memory parts and patching techniques. For instance, claims 7 and…

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 under 35 U.S.C. § 103 requires an analysis of 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 (POSA) in light of the prior art. An invention is considered obvious if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious to a POSA. This analysis typically involves identifying the scope and content of the prior art, ascertaining the differences between the prior art and the claimed invention, and resolving the level of ordinary skill in the pertinent art. A motivation to combine references must be articulated.
The priority date of US Patent 7238550 is February 26, 2002. Therefore, any prior art considered for obviousness must have an effective filing date before this date.
The present patent (US7238550) explicitly states that "modern adhesives provide new methods of mounting unpackaged parts. In particular, an improvement in the yield of Chip-on-Board memory modules can be…

4. Litigation History of the Patent

Public records reflect that the 7238550 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Untitled case — 2:24-cv-00629 · Texas Eastern District Court · Active litigation

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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