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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 7415530 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7415530 (the "7415530 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 is a concise summary of US Patent 7415530:

Title: System and methods for accelerated data storage and retrieval

Assignee: Realtime Data LLC

Inventors: James J Fallon

Filing Date: October 26, 2006

Issue Date: August 19, 2008

Abstract: The patent describes systems and methods for accelerating data storage and retrieval using lossless data compression and decompression. A data storage accelerator, incorporating multiple high-speed data compression encoders, compresses data at a rate equal to or faster than the input data stream's transmission rate. This compressed data is then stored in a target memory or storage device, effectively increasing the storage device's bandwidth....

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 7415530 Patent:

The most relevant prior art for US patent 7415530, considering patents cited by the examiner or applicant, would typically be those documents that predate the earliest priority date of

US7415530 (December 11, 1998, via its parent applications).

The Google Patents page for US7415530 lists a large number of "U.S. Patent Documents" under "References Cited." Due to the extensive list, providing a detailed analysis for every single citation is beyond the scope of a concise response. However, I can select a few representative examples from different time periods and inventors to illustrate the process and highlight potentially relevant prior art that predates the priority date.

The patent US7415530 explicitly states it is a continuation of U.S. Pat. No. 7,130,913, which is a continuation of U.S. Pat. No. 6,601,104. Both of these are incorporated by reference and share the earliest priority date (December 11, 1998) with US7415530 for common subject matter. While listed as "Patent citations" on Google Patents, they are generally considered family members and not anticipatory prior art in...

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:

I cannot perform an obviousness analysis of US patent 7415530 under 35 U.S.C. § 103 as requested. The provided patent text does not contain a "Prior art" section listing specific prior art references (e.g., other patents or publications) that could be combined to analyze obviousness. While the patent text includes "Prior art keywords" and a "Prior art date," these do not constitute specific references necessary for this type of analysis.

To conduct an obviousness analysis, I would need a list of actual prior art documents, such as those typically found in the "References Cited" section of a patent or cited during prosecution. Without these specific references, I cannot identify combinations or explain the motivation for a person having ordinary skill in the art to combine them.

4. Litigation History of the Patent

Public records reflect that the 7415530 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Realtime Data LLC v. Array Networks Inc. et al. — 21-2251 · District of Delaware, U.S. Court of Appeals for the Federal Circuit (CAFC) · Dismissal affirmed on appeal
- Realtime Data LLC v. Reduxio Systems, Inc. et al. — District of Delaware; U.S. Court of Appeals for the Federal Circuit; U.S. Supreme Court · filed 2017-11-01 · Judgment affirmed, petition denied
- RealTime Data, LLC v. Acronis — District of Massachusetts · filed 2017-07-12 · Dismissed with prejudice

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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