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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. 7430471 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7430471 (the "7430471 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 7,430,471

A concise summary of U.S. Patent 7,430,471 is provided below, based on a review of the patent documentation as of April 26, 2026.

Title: Method and system for monitoring a vehicle.

Assignee: The listed current assignee is Rfc Lenders Of Texas LLC. The original assignee was Payment Protection Systems Inc.

Inventor: Franklin C. Simon.

Filing Date: October 25, 2005.

Issue Date: September 30, 2008.

Abstract: A method for monitoring a vehicle includes detecting movement or activation of the vehicle, transmitting a signal indicating movement or activation of the vehicle, to a control center, transmitting any received operator identification information to...

## **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 7430471 Patent:

Prior Art Analysis for U.S. Patent 7,430,471

The following analysis details prior art references cited during the prosecution of U.S. Patent 7,430,471 ('471 patent). These references are evaluated for their potential to anticipate the independent claims of the '471 patent under 35 U.S.C. § 102, based on their content and publication dates relative to the '471 patent's priority date of October 25, 2004.

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#### 1. U.S. Patent 5,311,197 A

- Full Citation: US Patent 5,311,197 A, "Event-activated reporting of vehicle location," assigned to Trimble Navigation Limited.
- Filing Date: February 1, 1993.
- Brief Description: This patent describes a system for tracking a vehicle's location using GPS. A key feature is that the system reports the vehicle's location and status to a central station only when specific, predefined "events" occur. These events can include actions like the engine starting, a door opening, or the vehicle moving outside a designated geographical area (a geofence). The system is designed to reduce communication costs by not transmitting data continuously.
- Potential...

### 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 7,430,471 under 35 U.S.C. § 103

This analysis evaluates whether the independent claims of U.S. Patent 7,430,471 ('471 patent) would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention, considering the prior art cited during prosecution and other relevant art available before the priority date of October 25, 2004.

A PHOSITA in this technical field would likely have a background in electrical or computer engineering, with knowledge of vehicle electronics, telematics systems, radio frequency communication (including cellular and GPS), and basic security and authentication protocols. The central argument for obviousness is that the core elements of the '471 patent's claims—remote vehicle monitoring, operator identification, and communication with a control center—were well-established in the prior art. The novel element, the specific interaction with a "landmark," represents the combination of this established art with known, short-range location identification technologies (like RFID) to solve a...

### 4. Litigation History of the Patent

Public records reflect that the 7430471 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- RFC Lenders of Texas, LLC v. Samsara Inc. — 6:23-cv-00832 · Texas Western District Court · filed 2023-11-13 · Unknown
- RFC Lenders of Texas, LLC v. Geotab Inc. — 5:23-cv-00387 · Texas Western District Court · filed 2023-04-10 · Unknown
- RFC Lenders of Texas, LLC v. Omnitrac, LLC — 4:23-cv-00141 · Texas Eastern District Court · filed 2023-02-17 · Unknown

- RFC Lenders of Texas, LLC v. Motive Technologies, Inc. — 4:22-cv-00303 · Texas Eastern District Court · filed 2022-04-13 · Unknown
- RFC Lenders of Texas, LLC v. Verizon Connect Inc. — 4:22-cv-00266 · Texas Eastern District Court · filed 2022-03-30 · Unknown
- RFC Lenders of Texas, LLC v. Spireon, Inc. — 4:21-cv-00965 · Texas Eastern District Court · filed 2021-12-14 · Unknown
- RFC Lenders of Texas, LLC v. CalAmp Corp. — 4:21-cv-00686 · Texas Eastern District Court · filed 2021-09-07 · Unknown
- Orthosie Systems, LLC v. GPS Trackit — 4:20-cv-00629 · Texas Eastern District Court · filed 2020-08-19 · Unknown
- ...and 18 additional case(s)

## 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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