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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. 7571014 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7571014 (the "7571014 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**

A summary of US Patent 7571014 is provided below.

Title: Method and apparatus for controlling multimedia players in a multi-zone system

Assignee: Sonos Inc

Inventors: Robert A. Lambourne, Nicholas A. J. Millington

Filing Date: June 5, 2004

Issue Date: August 4, 2009

Abstract:

Techniques for controlling zone group and zone group characteristics such as audio volume in a multi-zone system are disclosed. The multi-zone system includes a number of multimedia players, each preferably located in a zone. A controller may control the operations of all of the zone players remotely from any one of the zones. Two or more zone players may be dynamically grouped as a zone group for synchronized...

## **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 7571014 Patent:

Prior Art Analysis for US Patent 7,571,014

As of May 13, 2026, the following analysis details the prior art cited during the prosecution of US Patent 7,571,014. The priority date for this patent is April 1, 2004. Each reference below predates this priority date and was considered by the USPTO examiner.

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#### U.S. Patent Documents

1. US Patent 6,985,771 B2: "Method and apparatus for providing media services to a wireless network of media player devices"

- Full Citation: Moore, et al., US Patent 6,985,771 B2.
- Filing Date: June 19, 2002.
- Description: This patent describes a system of wireless media players that communicate with a media server. The server can stream media to one or more players. It explicitly mentions grouping players, where a user can select a player to be a "group master." Other players can then be designated as "slaves," which synchronize their playback to the master. The system uses a remote control device to manage the players and groups.
- Potential Anticipation: This reference appears highly relevant. It discloses the concept of grouping players,...

### 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:

An obviousness analysis of US Patent 7,571,014 ("the '014 patent") under 35 U.S.C. § 103 requires identifying prior art references that, when combined, would have made the invention obvious to a person having ordinary skill in the art (a "PHOSITA") at the time of the invention. The critical date for this analysis is the earliest priority date of April 1, 2004.

Based on an analysis of the prior art, the independent claims of the '014 patent appear to be obvious in light of the combination of U.S. Patent 6,256,554 ("Di-Matteo") and U.S. Patent Application Publication No. 2002/0124097 ("Isely").

- Di-Matteo (US 6,256,554 B1): Filed November 17, 1997, and granted July 3, 2001, Di-Matteo teaches a "Multi-Zone Digital Audio System" that distributes digital audio streams over a network to multiple zones. Crucially, it discloses grouping zones together for synchronous playback of the same audio source and controlling the volume of individual zones or a group of zones from a central controller.
- Isely (US 2002/0124097 A1): Filed February 28, 2001, and published September 5, 2002, Isely...

### 4. Litigation History of the Patent

Public records reflect that the 7571014 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Sonos, Inc. v. Google LLC — 1:24-cv-00131 · U.S. District Court for the District of Delaware · filed 2024-02-01 · ongoing
- Sonos, Inc. v. D&M Holdings Inc. d/b/a THE D+M GROUP et al. — 1:14-cv-01330 · U.S. District Court for the District of Delaware · filed 2014-10-21 · 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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