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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. 7627805 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7627805 (the "7627805 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 7,627,805:
Title: Data coding with an efficient LDPC encoder
Assignee: Integral Wireless Technologies LLC (as of October 16, 2024). The patent was originally assigned to CONEXANT SYSTEMS Inc. and subsequently passed through several assignees including XocyST TRANSFER AG L.L.C., INTELLECTUAL VENTURES I LLC, and INTELLECTUAL VENTURES ASSETS 199 LLC before its current assignment.
Inventors: Cimarron Mittelsteadt, Wen-Yen Weng
Filing Date: June 6, 2006
Issue Date: December 1, 2009
Abstract: A method of coding data for transmission in a communication medium or channel is described. The method involves generating a codeword from a mother code parity…

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 7627805 Patent:

The USPTO's Patent Public Search tool is the authoritative source for patent searches. While I cannot directly access and perform a live search on the USPTO database in the same way a

human would, I can extract and present the cited prior art from the provided patent text of US7627805. The "Citations" section of the patent itself lists the prior art considered by the examiner.
Here is an analysis of the most relevant prior art cited in US Patent 7,627,805:
I. Patent Citations
1. US6785863B2
Full Citation: US 6,785,863 B2 (Motorola, Inc.)
Publication/Filing Date: Publication: August 31, 2004; Priority: September 18, 2002
Brief Description: This patent describes a method and apparatus for generating parity-check bits from a symbol set. It focuses on constructing parity-check matrices for block codes, particularly for efficient encoding of systematic codes, which could involve generating a parity-check matrix with a structured form suitable for encoding.
Potential Anticipated Claim(s) under 35 U.S.C. § 102: This patent could potentially anticipate aspects of claims 1 and 11,…

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 under 35 U.S.C. § 103 for US Patent 7,627,805 requires identifying combinations of prior art that would have made the claimed invention obvious to a person having ordinary skill in the art (PHOSITA) at the time of the invention (priority date of June 8, 2005). The analysis will focus on the independent claims (Claims 1, 11, and 17) and utilize the prior art references cited in the patent itself, inferring their technical teachings from their titles and general knowledge in the field.
The problem addressed by US7627805 is the need for efficient LDPC code implementations in communication systems to support high data rates without increasing hardware complexity. The patent's solution involves a structured LDPC code using a "mother code parity check matrix" built from "m-by-m square matrices with cyclic structure," and a "macro matrix" that represents the non-zero sub-matrices.
Relevant Prior Art References and Inferred Teachings:
The following references are highlighted from the "Prior Art" section of US7627805B2:
1. Richardson et al., "Efficient encoding of…

4. Litigation History of the Patent

Public records reflect that the 7627805 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Integral Wireless Technologies LLC v. Amazon.com, Inc. — 2:25-cv-00388 · Texas Eastern District Court · filed 2025-04-25 · Active

• Integral Wireless Technologies LLC v. T-Mobile US, Inc. — 0:25-cv-62665 · Florida Southern District Court · filed 2025-04-25 · Active

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]