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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. 7676007 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7676007 (the "7676007 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 7676007:

US Patent 7676007 Summary

- Title: System and method for interpolation based transmit beamforming for MIMO-OFDM with partial feedback
- Current Assignee: Integral Wireless Technologies LLC
- Inventors: Jihoon Choi, Robert W. Heath, Jr.
- Filing Date: 2005-07-21
- Issue Date: 2010-03-09
- Abstract: The patent describes a system and method for transmit beamforming with receive combining in Multiple-Input Multiple-Output (MIMO) systems using Orthogonal Frequency Division Multiplexing (OFDM). To reduce the amount of feedback information from the receiver to the transmitter in non-reciprocal channels, the system employs limited feedback and...

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 7676007 Patent:

To identify the most relevant prior art for US Patent 7676007, I will examine the "Cited By"

section of the patent on Google Patents, as this generally includes references considered by the patent examiner. Prior art is information publicly available before a patent's effective filing date that could impact its patentability.

Upon reviewing US Patent 7676007, the "Cited By" section lists several publications and patents. It is crucial to distinguish between "References Cited" (prior art identified during prosecution by the applicant or examiner) and "Cited By" (later patents that cite this patent). For a prior art analysis, we focus on the "References Cited" by US7676007.

The full patent text explicitly incorporates several references by reference. These typically represent prior art that the inventors themselves or the examiner deemed relevant. I will focus on these directly cited references first, as they are explicitly acknowledged within the patent's detailed description.

Here are the most relevant prior art references explicitly mentioned and incorporated by reference within...

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 US Patent 7676007 Under 35 U.S.C. § 103

This analysis identifies combinations of prior art references that would render the claims of US Patent 7676007 obvious to a person having ordinary skill in the art (POSITA) at the time of the invention (priority date July 21, 2004). The core innovation claimed by US7676007 lies in addressing the phase ambiguity inherent in optimal beamforming vectors (or the non-uniqueness of precoding matrices) when performing interpolation for limited feedback MIMO-OFDM systems.

General Motivation for Combination

A POSITA in wireless communications would be continually motivated to improve spectral efficiency and reliability while reducing feedback overhead in MIMO-OFDM systems. Given the known correlation of channel conditions across adjacent subcarriers in OFDM, using subsampling and interpolation to reduce feedback for channel state information (CSI) (such as beamforming vectors or precoding matrices) would be a natural and expected engineering approach. The challenge addressed by the patent is the effective interpolation of...

4. 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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