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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. 7707214 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7707214 (the "7707214 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 7,707,214, along with a plain-language overview of its independent claims:

US Patent 7,707,214 Summary

- Title: Hierarchical update scheme for extremum location with indirect addressing
- Assignee: Integral Wireless Technologies LLC
- Inventor: Donald Martin Monro
- Filing Date: February 21, 2007
- Issue Date: April 27, 2010
- Abstract: A system and method for determining an extreme value of data in various applications including audio, video, and image encoding schemes. The system and method are used to generate a hierarchical data structure by partitioning the data values and then generating a hierarchy using indices of these data values, with the...

## **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 7707214 Patent:

The USPTO database confirms that US Patent 7,707,214 is "Active" and has an "adjusted

expiration" date of "2027-11-20".

To identify the most relevant prior art for US patent 7707214, I need to access the cited references within the patent document itself. Since I already have the full patent text, I will analyze the "References Cited" section of US7707214B2 to extract the prior art and then assess their relevance.

Here's the analysis of the prior art cited in US Patent 7,707,214:

Cited Patent Documents:

- U.S. Pat. No. 5,699,121 to Zakhor and Neff

Full Citation: U.S. Pat. No. 5,699,121, 16 Dec. 1997, Zakhor and Neff.

Publication/Filing Date: Issued December 16, 1997. The filing date is not explicitly stated in the provided text but is prior to the publication date.

Brief Description: This patent describes a "Method and apparatus for compression of very low bit rate video signals." The patent US7707214B2 specifically mentions it in the context of Matching Pursuits (MP) methods being applied to 2D video coding.

Potential Anticipation (35 U.S.C. § 102): This patent is highly...

### **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 under 35 U.S.C. § 103 for US Patent 7,707,214

This analysis considers combinations of prior art references that would render the claims of US Patent 7,707,214 obvious to a person having ordinary skill in the art (PHOSITA) at the time of the invention (priority date February 21, 2007). The patent addresses the inefficiency of repeatedly searching large, sparsely updated datasets for extrema, particularly in applications like video encoding using Matching Pursuits (MP) algorithms.

The core invention of US 7,707,214 lies in the use of a hierarchical data structure (e.g., a pyramid or tree) to efficiently locate and update extreme data values (e.g., maximum absolute inner products) within a dataset. This structure is built by partitioning a base level of data values and generating successive higher levels, each holding indices to extreme values of the partitions in the level below it, culminating in an apex containing the index of the overall extremum.

Crucially, when a data value changes at the base level, only the affected portions of the hierarchy are updated,...

### **4. Litigation History of the Patent**

Public records reflect that the 7707214 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Untitled case — 2:26-cv-00198 · Eastern District of Texas · 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]**

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