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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. 7818176 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7818176 (the "7818176 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 technical analysis of US Patent 7,818,176 reveals a foundational patent in the field of voice-based advertising, detailing a system for delivering targeted ads in response to natural language speech.

Title: System and method for selecting and presenting advertisements based on natural language processing of voice-based input.

Assignee at Grant: VoiceBox Technologies, Inc. Subsequent assignment records indicate the patent is now held by VB Assets, LLC.

Inventors: Tom Freeman, Mike Kennewick

Filing Date: February 6, 2007

Issue Date: October 19, 2010

Abstract: The patent describes a system and method for choosing and showing ads based on the natural language processing of spoken input...

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 7818176 Patent:

Prior Art Analysis for US Patent 7,818,176

An analysis of the prior art cited during the prosecution of US Patent 7,818,176 reveals several key patents that disclose elements related to voice recognition, natural language processing, and advertising. The following references are the most relevant to the independent claims of the '176 patent.

Key Prior Art References

1. US Patent 6,499,013 B1: "Interactive user interface using speech recognition and natural language processing"

- Full Citation: US Patent 6,499,013 B1, filed by Jourjine et al. on September 9, 1998, and granted on December 24, 2002. Assigned to One Voice Technologies, Inc.
- Publication/Filing Date: Filed September 9, 1998; Published December 24, 2002.
- Brief Description: This patent describes a user interface that uses speech recognition and natural language processing to control a computer and its applications. It discloses a system that can receive a natural language utterance, interpret it to understand the user's intent, and execute a command. The focus is on providing a more natural and intuitive way for...

4. Litigation History of the Patent

Public records reflect that the 7818176 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- VB Assets LLC v. Android International Inc et al. — 1:26-cv-00443 · Delaware District Court · filed 2026-04-17 · Open
- VB Assets, LLC v. Amazon.com, Inc. et al. — 1:19-cv-01410-MN · U.S. District Court for the District of Delaware · filed 2019-07-26 · Settled
- VB Assets, LLC v. General Motors LLC — 1:24-cv-01279 · U.S. District Court for the District of Delaware · filed 2024-10-02 · Active
- VB Assets, LLC v. Apple Inc. — 1:24-cv-01368 · U.S. District Court for the District of Delaware · filed 2024-10-28 · Active
- VB Assets, LLC v. Samsung Electronics Co., Ltd. et al. — 2:24-cv-00828 · U.S. District Court for the Eastern District of Texas · filed 2024-10-09 · Active

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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