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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. 7936415 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7936415 (the "7936415 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

An analysis of United States Patent 7,936,415 reveals the following details regarding its invention and legal status.

Title: Light source apparatus and liquid crystal display having the same

Current Assignee: As of the latest assignment recorded on July 10, 2024, the assignee for US Patent 7,936,415 is Light Guide Innovations LLC. The original assignee was LG Innotek Co Ltd.

Inventor: Jun Seok Park

Filing Date: August 8, 2007

Issue Date: May 3, 2011

Abstract: The patent describes a light source apparatus, primarily for a liquid crystal display (LCD), that features a modular design. The apparatus includes a housing with a groove that holds at least one module substrate (a circuit...

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 7936415 Patent:

Analysis of Prior Art for U.S. Patent No. 7,936,415

Date of Analysis: May 13, 2026

Patent under Review:

- Patent Number: 7,936,415
- Title: Light source apparatus and liquid crystal display having the same
- Filing Date: August 8, 2007
- Issue Date: May 3, 2011
- Assignee at Issue: Light Guide Innovations LLC

This report details the most relevant prior art cited in the prosecution of U.S. Patent No. 7,936,415. The analysis focuses on the potential for anticipation of the patent's claims under 35 U.S.C. § 102. The core invention of the '415 patent relates to a light source apparatus, particularly for LCD backlights, that is constructed from multiple "module substrates" holding LEDs. These substrates are designed to be connected in series using separate "connecting substrates," which provide both mechanical and electrical linkage. A key feature is the use of a "termination connecting substrate" to create a closed-loop circuit at the end of the series of modules.

Independent Claim 1 of US 7,936,415:

"1. A light source apparatus comprising:
at least one module substrate comprising...

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:

Based on an analysis of the prior art cited during the prosecution of US patent 7,936,415, several strong arguments for obviousness under 35 U.S.C. § 103 can be constructed against its claims. A person having ordinary skill in the art (POSA) in the field of LED lighting and display backlights at the time of the invention (circa 2006) would have been knowledgeable about printed circuit board (PCB) design, LED integration, and common electrical connection techniques.

The core inventive concept of the '415 patent, as defined in independent claims 1, 12, and 16, is a modular lighting system. This system is characterized by:

1. Multiple module substrates (PCBs with LEDs) that are designed to be identical.
2. Connecting terminals at both ends of each module substrate.
3. Separate intermediate connecting substrates to mechanically and electrically link the module substrates in series.
4. A distinct termination connecting substrate with a pre-formed "closed loop pattern" that attaches to the final module substrate in the series to complete the electrical circuit.

The following analysis...

4. Litigation History of the Patent

Public records reflect that the 7936415 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Light Guide Innovations LLC v. TCT Mobile International Limited et al. — 2:24-cv-00646 · U.S. District Court for the Eastern District of Texas · filed 2024-08-08 · Closed
- Light Guide Innovations LLC v. Hisense Company Ltd. et al. — 2:25-cv-00051 · U.S. District

Court for the Eastern District of Texas · filed 2025-01-17 · Open

- Light Guide Innovations LLC v. Walmart Inc. — 2:25-cv-00312 · U.S. District Court for the Eastern District of Texas · filed 2025-03-21 · Open
- Light Guide Innovations LLC v. Samsung Electronics Co. Ltd. et al. — 2:25-cv-01093 · U.S. District Court for the Eastern District of Texas · filed 2025-10-31 · Open
- Hisense USA Corp. v. Light Guide Innovations LLC — IPR2025-01537 · Patent Trial and Appeal Board (PTAB) · filed 2025-09-19 · Not Instituted - Procedural

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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