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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. 7969880 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 7969880 (the "7969880 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

Patent Analyst Report: US 7,969,880 B2

Date of Analysis: April 26, 2026

This report provides a summary of United States Patent 7,969,880 B2, including its key bibliographic data, a plain-language explanation of its independent claims, and the current status of the patent.

I. Bibliographic Information

- Title: Device and method for relaying packets
- Assignee: The current assignee of record is Athena Security LLP. The original assignee was Alaxala Networks Corp.
- Inventors: Hiroki Yano, Kazuo Sugai, Shinichi Akahane, Takao NARA
- Filing Date: July 31, 2007
- Issue Date: June 28, 2011
- Abstract: "Computing process with a computational expression is executed using seed information..."

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 7969880 Patent:

V. Analysis of Prior Art Cited in Prosecution

This section details the prior art references cited by the USPTO examiner during the prosecution of the application that led to US Patent 7,969,880. These references were considered by the examiner but the claims of the '880 patent were ultimately deemed patentable over them. An analysis of each reference provides insight into the novel aspects of the '880 patent.

A. U.S. Patent Documents

- US 6,954,435 B2 - "Method and apparatus for selecting a link from a link aggregate group"
Full Citation: Roberts, Edward P., et al. Method and apparatus for selecting a link from a link aggregate group. U.S. Patent 6,954,435 B2, filed March 19, 2002, and issued October 11, 2005.
Brief Description: This patent describes a method for distributing data frames across multiple links in a link aggregate group (LAG). It discloses using a hash function on packet header information (such as source and destination addresses) to select a specific link within the LAG for transmission. The goal is to balance the traffic load across the available links....

4. Litigation History of the Patent

Public records reflect that the 7969880 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Athena Security Inc v. Google LLC — 7:26-cv-00158 · Texas Western District Court · filed 2026-04-20 · Open
- Athena Security, LLP v. Dell Technologies, Inc. — 7:26-cv-00025 · U.S. District Court for the Western District of Texas · filed 2026-01-23 · active and ongoing
- Athena Security, LLP v. Hewlett Packard Enterprise Company — 2:25-cv-01252 · U.S. District Court for the Eastern District of Texas · filed 2025-12-23 · active and ongoing
- Athena Security, LLP v. Cisco Systems, Inc. — U.S. District Court for the Western District of Texas · ongoing

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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