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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 8085192 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8085192 (the "8085192 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 8085192:

US Patent 8085192: Summary

- Title: Device, system and method for controlling and storing sensitive information on a GPS device
- Assignee: Longhorn Automotive Group LLC (current assignee as of March 26, 2024); Rothschild Trust Holdings LLC (assigned April 4, 2012).
- Inventor: Leigh M. Rothschild
- Filing Date: April 5, 2010 (for application number US12/753,963)
- Issue Date: December 27, 2011
- Abstract: This patent describes a system and method designed to control and securely store sensitive information on a Global Positioning System (GPS) device. The system incorporates a module to determine location information, an encryption module to...

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 8085192 Patent:

Here is an analysis of the most relevant prior art for US Patent 8085192, based on the citations

provided within the patent text:

The independent claims of US8085192 B2 focus on a location information device with secure data storage, involving:

- Determining location information (at least a route traveled)
- Encrypting this determined location information
- Storing the encrypted information in a storage module (removable or internal)
- A processing module for handling the storage and retrieval of this encrypted information
- Systems that involve an external computing device with a reader or connectivity to decrypt this information
- User input of a code string or user verification (e.g., biometric) for decryption/access

The following prior art references are identified as most relevant:

1. US20040010699A1

- Full Citation: US20040010699A1 - "Secure data management techniques" by Zhimin Shao.
- Publication/Filing Date: Published: 2004-01-15 (Priority date: 2002-02-07).
- Brief Description: This patent application discloses general methods and systems for secure data...

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 8085192 under 35 U.S.C. § 103

This analysis identifies combinations of prior art references that would render the claims of US Patent 8085192 obvious to a person having ordinary skill in the art (POSITA) at the time of the invention (priority date: September 6, 2005). The analysis utilizes the prior art identified in the "Prior art" section:

1. US7117075B1 (Report On Board Llc): "Driver activity and vehicle operation logging and reporting" (Published: 2006-10-03; Priority: 2005-08-15).
2. US20040010699A1 (Zhimin Shao): "Secure data management techniques" (Published: 2004-01-15; Priority: 2002-02-07).
3. US20060204047A1 (Sanjay Dave): "Portable memory storage device with biometric identification security" (Published: 2006-09-14; Priority: 2005-03-09).

Combination I: Report On Board (US7117075B1) + Shao (US20040010699A1)

This combination renders independent Claims 1, 13, 19, and 22, along with dependent Claims 2, 11, 12, 14, 15, 20, and 21, obvious.

Motivation for Combination:

Report On Board discloses a device for "logging and reporting driver..."

4. Litigation History of the Patent

Public records reflect that the 8085192 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Longhorn Automotive Group LLC v. Volvo North America LLC et al. — US District Court for the Eastern District of Texas · filed 2026-03-24 · active

- Unified Patents v. Longhorn Automotive Group LLC — IPR2025-00925 · Patent Trial and Appeal Board (PTAB) · filed 2025-04-24 · Not Instituted - Procedural
- Untitled case — 2:26-cv-00235 · Texas Eastern District Court · Filed (Ongoing)

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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