

**SAMPLE — NOT LEGAL ADVICE.** This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[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. 8224794 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8224794 (the "8224794 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 is a concise summary of US Patent 8,224,794.

Title: Clearinghouse system, method, and process for inventorying and acquiring infrastructure, monitoring and controlling network performance for enhancement, and providing localized content in communication networks

Assignee: Massively Broadband LLC

Inventor: Theodore S. Rappaport

Filing Date: September 10, 2008

Issue Date: July 17, 2012

Abstract: A computerized system, method and process allows telecommunications carriers to find, evaluate and select locations for equipment through direct access to end users, while providing citizens the opportunity to offer the use of their dwelling or other assets to carriers. The system and...

## **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 8224794 Patent:

Analysis of Prior Art for U.S. Patent 8,224,794

An analysis of the prior art cited during the prosecution of U.S. Patent 8,224,794, titled "Clearinghouse system, method, and process for inventorying and acquiring infrastructure, monitoring and controlling network performance for enhancement, and providing localized content in communication networks," reveals several key patents and published applications that were considered by the USPTO. This review is critical in understanding the scope of the '794 patent's claims and the technological landscape at the time of its filing on September 10, 2008. The following presents the most relevant cited references and their potential impact on the patent's claims under 35 U.S.C. § 102 for anticipation.

#### Key Prior Art and Potential Anticipation of Claims

The core of the '794 patent revolves around a centralized "clearinghouse" that facilitates the inventorying and acquisition of telecommunications infrastructure by connecting property owners with carriers. It also includes functionalities for network performance monitoring and delivering...

### 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 8,224,794

This analysis, conducted as of May 13, 2026, evaluates the obviousness of the claims of US patent 8,224,794 under 35 U.S.C. § 103, considering the state of the art prior to the patent's priority date of September 10, 2007. The patent's claims are broadly directed to three distinct, though related, concepts: 1) a clearinghouse for telecommunications infrastructure, 2) a system for monitoring network performance using crowd-sourced data, and 3) a method for providing localized content. Each of these concepts is rendered obvious by a combination of prior art references.

A person having ordinary skill in the art (PHOSITA) at the time of the invention would have possessed a degree in computer science or electrical engineering, along with several years of experience in web application development, telecommunications, or network systems engineering.

---

#### 1. Claims for an Infrastructure Clearinghouse (e.g., Claim 1)

Summary of Claim 1: This claim describes a computer system functioning as a clearinghouse. It maintains a database with two sets...

### 4. Litigation History of the Patent

Public records reflect that the 8224794 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Massively Broadband LLC v. Samsung Electronics Co., Ltd. et al. — 2:25-cv-00608 · U.S. District Court for the Eastern District of Texas · filed 2025-06-06 · pending
- Unified Patents v. Massively Broadband LLC — IPR2026-00103 · U.S. Patent and Trademark Office, Patent Trial and Appeal Board · Not instituted

## 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]

**DISCLAIMER. This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.**

*Generated May 14, 2026 by [ihatepatentrolls.com](http://ihatepatentrolls.com) — sample only.*