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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. 8267537 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8267537 (the "8267537 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

Summary of U.S. Patent 8,267,537

A concise summary of U.S. Patent 8,267,537 is provided below, based on a review of the patent documentation and other publicly available information as of April 26, 2026.

Title: Backlight unit and display device having the same

Assignee: The current assignee of record is Light Guide Innovations LLC. The patent was originally assigned to LG Innotek Co., Ltd.

Inventors: Jun Seok Park

Filing Date: December 21, 2007

Issue Date: September 18, 2012

Abstract: The patent discloses a backlight unit and a display device incorporating it. The backlight unit comprises a light-emitting diode (LED) module, a case that supports the LED module and includes a "bending...

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 8267537 Patent:

Prior Art Analysis for U.S. Patent 8,267,537

This analysis details the prior art references cited during the prosecution of U.S. Patent 8,267,537 ('537). The '537 patent has a priority date of December 29, 2006. Each reference listed below predates this priority date and was considered by the USPTO examiner. The core inventive concept of the '537 patent, as defined in its independent claims (1 and 13), involves a backlight unit with three main components:

1. An LED module.
2. A case to support the module.
3. A "bending part" that is part of the case, designed to guide and fix one end of the LED module.
4. A separate "fixing part" (e.g., a screw) to secure another end of the LED module.

This configuration aims to reduce the number of separate fixing parts, thereby simplifying the assembly and replacement of the LED modules.

Key Prior Art References and Potential Anticipation

The following references were cited by the examiner and are most relevant to the claims of the '537 patent. An analysis of potential anticipation under 35 U.S.C. § 102 is provided for each.

1. US...

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 U.S. Patent 8,267,537

An analysis of U.S. Patent 8,267,537 ("the '537 patent") and the relevant prior art suggests that the claims of the patent would have been considered obvious to a person having ordinary skill in the art (POSA) at the time the invention was made. The legal standard for obviousness is established under 35 U.S.C. § 103, which states that a patent may not be obtained if the differences between the claimed invention and the prior art are such that the invention as a whole would have been obvious to a POSA.

The core of the '537 patent, particularly independent claim 1, lies in a backlight unit with an LED module, a supporting case, a "bending part" to fix one end of the module, and a separate "fixing part" for another end. The stated goal is to simplify the replacement of LED modules. This configuration represents a combination of known elements to achieve a predictable result. Several combinations of prior art references can be asserted to render the claims of the '537 patent obvious. Below are two such combinations.

Combination 1: US...

4. Litigation History of the Patent

Public records reflect that the 8267537 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. Walmart Inc. — 2:25-cv-00312-RWS-RSP · U.S. District Court for the Eastern District of Texas · Pending
- Light Guide Innovations, LLC v. TCT Mobile International Limited, et al. — 2:24-cv-00646-RWS-RSP · U.S. District Court for the Eastern District of Texas · Pending

- Light Guide Innovations, LLC v. Hisense Company Ltd., et al. — 2:25-cv-00051-RWS-RSP · U.S. District Court for the Eastern District of Texas · Pending
- Hisense USA Corp. et al. v. Light Guide Innovations LLC — IPR2025-01538 · U.S. Patent and Trademark Office, Patent Trial and Appeal Board (PTAB) · filed 2025-09-15 · Denied Institution

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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