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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 8279642B2 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8279642B2 (the "8279642B2 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

US patent 8279642B2, titled "Apparatus for converting direct current to alternating current using an active filter to reduce double-frequency ripple power of bus waveform", was filed on September 21, 2009, and issued on October 2, 2012. The original assignee was Solarbridge Technologies Inc. The current assignees are GRIDSCALE SOLUTIONS, LLC, and Enphase Energy Inc. The inventors are Patrick L. Chapman, Brian T. Kuhn, Robert S. Balog, Jonathan W. Kimball, Philip T. Krein, and Alexander Gray.

Abstract:

The patent describes an inverter for converting an input direct current (DC) waveform from a DC source to an output alternating current (AC) waveform for delivery to an AC grid. This inverter...

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 8279642B2 Patent:

To identify the most relevant prior art for US patent 8279642B2, I will examine the "Cited by" and "References" sections within the patent document itself on Google Patents, as the USPTO database direct search functionality for citations is not directly exposed in the search results. Here's an analysis of the cited prior art from US8279642B2:

Most Relevant Prior Art for US Patent 8279642B2

The patent US8279642B2 lists several prior art documents. A thorough review of these documents reveals their relevance to the claimed invention.

Cited US Patents:

- US7327091B2

Full Citation: US7327091B2, "Method and apparatus for ripple correlation control based on limited sampling"

Publication/Filing Date: Published February 5, 2008, filed April 29, 2005.

Brief Description: This patent describes a ripple correlation control method for maximum power point tracking (MPPT) in power converters, particularly relevant for photovoltaic systems. It focuses on using limited sampling to reduce ripple.

Potential Anticipation (35 U.S.C. § 102): US7327091B2 appears highly relevant to aspects of...

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 under 35 U.S.C. § 103

To establish obviousness, it must be shown that a person of ordinary skill in the art (POSITA) would have been motivated to combine existing prior art references to arrive at the claimed invention, and would have had a reasonable expectation of success. The patent US8279642B2 generally addresses the conversion of DC power to AC power, particularly for renewable energy sources like photovoltaic cells, while actively mitigating double-frequency ripple power on a power bus.

Here, we consider the following prior art references explicitly mentioned in the US8279642B2 specification:

1. U.S. Patent Publication No. 2008/018338 to Kimball et al. ("Kimball '338"): This publication describes a Maximum Power Point Tracking (MPPT) algorithm, specifically "Ripple Correlation Control Based on Limited Sampling," for photovoltaic applications. It focuses on optimizing power extraction from DC sources like solar panels by utilizing inherent ripple to track the maximum power point.
2. U.S. patent application Ser. No. 11/871,015 to Krein et al. ("Krein...

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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