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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. 8315769 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8315769 (the "8315769 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

A technical analysis of U.S. Patent 8,315,769 is provided below.

Summary of U.S. Patent 8,315,769

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| :--- | :--- |

| Title | Absolute acceleration sensor for use within moving vehicles |

| Assignee | Vision Works IP Corp |

| Inventors | Alfred S. Braunberger, Beau M. Braunberger |

| Filing Date | November 22, 2011 |

| Issue Date | November 20, 2012 |

| Abstract | A communication system for a vehicle includes a vehicle speed sensor configured to emit a periodic function with a parameter correlated to the speed of the vehicle, an acceleration monitoring system, a braking system engagement detector to detect a braking status of the vehicle, an alerting device capable of signaling other...

## 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 8315769 Patent:

## Analysis of Prior Art Cited in U.S. Patent 8,315,769

During the examination of U.S. Patent 8,315,769 ('769 patent), the USPTO examiner cited several prior art references. The following analysis details the most relevant of these references and their potential impact on the patentability of the '769 patent's claims, particularly the independent claims 1, 9, and 21, which define the core invention related to an active suspension control system.

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### 1. U.S. Patent No. 7,047,120 B2 (to Breed)

- Full Citation: US 7,047,120 B2, "Arrangement to accurately measure vehicle motion and position," Inventor: David S. Breed, Assignee: Automotive Technologies International, Inc.
- Dates: Filed: July 1, 2002; Issued: May 16, 2006.
- Brief Description: Breed '120 discloses a system for accurately determining the motion and position of a vehicle. Crucially, it describes using a combination of accelerometers and gyroscopes (an "inertial measurement unit" or IMU) to measure vehicle accelerations. It explicitly teaches that the gyroscopes are used to determine the orientation of the accelerometers...

## 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:

### Analysis of Obviousness under 35 U.S.C. § 103

This analysis examines whether the invention claimed in U.S. Patent 8,315,769 ('769 patent) would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made. An invention is considered obvious if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious to a PHOSITA. This analysis relies on the prior art references detailed in the preceding section. A PHOSITA in this technical field would likely be an automotive engineer or a control systems engineer with a bachelor's degree in mechanical or electrical engineering and several years of experience in vehicle dynamics, sensor integration, and active suspension control systems. The independent claims (1, 9, and 21) of the '769 patent can be rendered obvious by combining the teachings of the prior art, most notably by combining U.S. Patent No. 7,047,120 B2 (Breed) with either U.S. Patent No. 6,470,265 B1 (Hac '265) or U.S. Patent No. 6,529,810 B2 (Naito).

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Primary...

## 4. Litigation History of the Patent

Public records reflect that the 8315769 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Vision Works IP Corp. v. Tesla, Inc. — 2:25-cv-00999 · Texas Eastern District Court · filed 2025-10-01 · Dismissed without prejudice
- Vision Works IP Corp. v. Suzuki Motor Corporation — 2:25-cv-00429 · Texas Eastern District Court · filed 2025-04-23 · Active
- Vision Works IP Corp. v. Jaguar Land Rover Automotive PLC — 2:24-cv-01013 · Texas Eastern

District Court · filed 2024-12-09 · Dismissed with prejudice

- Vision Works IP Corp. v. Mercedes-Benz USA, LLC et al. — 3:22-cv-01349 · California Southern District Court · filed 2022-09-08 · Active
- Vision Works IP Corp. v. Polaris, Inc. — 2:21-cv-01173 · Washington Western District Court
- Vision Works IP Corp. v. Volvo Car USA LLC — 2:24-cv-02021 · New Jersey District Court · filed 2024-03-08 · Closed
- Vision Works IP Corp. v. Subaru of America, Inc. — 1:24-cv-00961 · Georgia Northern District Court · filed 2024-03-04 · Closed
- Vision Works IP Corp. v. Nissan North American Inc. — 3:22-cv-00301 · California Southern District Court · filed 2022-03-04 · Closed

## 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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