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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. 8327051B2 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8327051B2 (the "8327051B2 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 US Patent 8327051B2

Title: Portable handheld memory card and methods for use therewith

Assignee: As of the latest assignment recorded on August 15, 2024, the assignee is Palisade Technologies, LLP. The original assignee was SanDisk Technologies LLC.

Inventor: Myeong Joon Kang

Filing Date: November 20, 2007

Issue Date: December 4, 2012

Abstract:

"In one embodiment, a portable handheld memory card may include a Universal Serial Bus (USB) port, USB controller circuitry, an input/output (I/O) port, a memory, and decompression circuitry configured to decompress compressed data stored in the memory. The memory card includes a housing storing the memory and exposing the USB port...

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 8327051B2 Patent:

Analysis of Prior Art for U.S. Patent 8,327,051 B2

The following analysis details the most relevant prior art cited against U.S. Patent 8,327,051 B2. This information is critical for understanding the novelty and non-obviousness of the patent's claims. Each cited reference is examined for its potential to anticipate the claims of the '051 patent under 35 U.S.C. § 102.

Key Prior Art and Potential Anticipation of Claims:

The '051 patent discloses a portable handheld memory card with both a Universal Serial Bus (USB) port and a second input/output (I/O) port (such as a Secure Digital port) on the same end, allowing for a single insertion direction. The invention also includes on-board circuitry for decompression and decryption of data. The following prior art references are most pertinent to these claims.

1. US Patent 7,287,703 B2: "Removable memory cards including USB and other controllers, connectors, and methods of operating same"

- Full Citation: US Patent 7,287,703 B2
- Assignee: Samsung Electronics Co., Ltd.
- Publication Date: October 30, 2007
- Filing Date: July 23,...

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:

Based on my analysis of the prior art cited in US patent 8,327,051 B2, several strong arguments for obviousness under 35 U.S.C. § 103 can be made against its claims. The core invention combines a dual-interface memory card (USB and a memory card standard like Secure Digital) with on-card data processing (decompression and decryption) and a specific physical pin layout for user convenience. The cited prior art discloses these elements, and a person having ordinary skill in the art (PHOSITA) would have been motivated to combine them to achieve a predictable result.

Analysis of Independent Claim 1

Claim 1 recites a portable memory card with a USB port, an I/O port (e.g., Secure Digital), their respective controller circuits, a memory, and a housing. The key limitations are the physical arrangement of the ports:

- They are on the same end to allow a same card-insertion direction.
- They are positioned so that when one port is connected, at least one pin of the other port is not electrically connected.

This claim would have been obvious over the combination of US7,287,703 B2 to...

4. Litigation History of the Patent

Public records reflect that the 8327051B2 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Palisade Technologies, LLP v. Micron Technology, Inc. et al. — 7:24-cv-00262 · U.S. District Court for the Western District of Texas · filed 2024-10-16 · Dismissed with prejudice

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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