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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. 8352584 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8352584 (the "8352584 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 8,352,584

A concise summary of United States Patent 8,352,584, titled "System for Hosting Customized Computing Clusters," is provided below, based on a review of USPTO data. No records of involvement in the CAFC 2026 dockets were found for this patent.

Title: System for Hosting Customized Computing Clusters

Assignee: GOOGLE INC.

Inventors: Urs Hoelzle, Luiz Andre Barroso, James R. Larus, Robert W. Stroud, Chandramohan A. Thekkath

Filing Date: August 9, 2011

Issue Date: January 8, 2013

Abstract:

The patent describes a system and method for efficiently managing a large number of computing clusters. The invention involves a hosting system that can receive requests...

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 8352584 Patent:

Based on a technical analysis of the patent citations listed for U.S. Patent 8,352,584, the following prior art references are identified as most relevant. The analysis focuses on the potential for anticipation of the independent claims (Claim 1 and Claim 10) under 35 U.S.C. § 102, which requires a single prior art reference to disclose every element of the claim.

Most Relevant Prior Art

The most significant prior art references are those that disclose the core concept of a third-party hosting provider offering customized, isolated computing environments to different clients.

1. U.S. Patent Application Publication No. 2009/0019535 A1

- Full Citation: US 2009/0019535 A1, "Method and remote system for creating a customized server infrastructure in real time".

- Filing Date: July 10, 2007.

- Brief Description: This application describes a system operated by a hosting provider that allows a customer to remotely design and provision a custom server infrastructure in real-time. Customers can select from a pool of available computing resources (servers, storage, networking) to create a...

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

This analysis evaluates whether the invention claimed in U.S. Patent 8,352,584 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time the invention was made, considering the priority date of October 30, 2007. The analysis combines teachings from the prior art references identified in the preceding section.

A PHOSITA in this context would be an individual with a degree in computer science or a related field and several years of experience in distributed systems, network architecture, and data center operations, including familiarity with different types of computing clusters like High-Performance Computing (HPC).

Summary of Obviousness Argument

The independent claims of the '584 patent are likely obvious under 35 U.S.C. § 103. The core elements—a third-party hosting service providing customized, isolated computing environments to remote clients over a public network—are taught by prior art such as US 2009/0019535 A1 ('535) and US 2006/0143350 A1 ('350). The novel element claimed in the '584 patent is...

4. Litigation History of the Patent

Public records reflect that the 8352584 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Health Care Service Corp v. OL Security LLC et al. — 1:26-cv-00466 · Delaware District Court · filed 2026-04-23 · Open

- Chemtron Research LLC v. T-Mobile US, Inc. — 1:26-cv-00425 · U.S. District Court for the Western District of Texas · filed 2026-04-19 · Active/Ongoing

- Chemtron Research LLC v. Samsung Electronics Co., Ltd. — 3:26-cv-00978 · U.S. District Court for the Northern District of Texas · filed 2026-04-12 · Active/Ongoing

- Chemtron Research LLC v. General Motors Company — 1:25-cv-01147 · U.S. District Court for the Western District of Texas · filed 2025-10-20 · Active/Ongoing
- Chemtron Research LLC v. FedEx Corporate Services, Inc. — 2:25-cv-02956 · U.S. District Court for the Western District of Tennessee · filed 2025-10-10 · Active/Ongoing
- Chemtron Research LLC v. Toyota Motor North America, Inc. — 4:25-cv-00576 · U.S. District Court for the Eastern District of Texas · filed 2025-07-23 · Active/Ongoing
- Chemtron Research LLC v. American Airlines, Inc. — 3:25-cv-00631 · U.S. District Court for the Northern District of Texas · filed 2025-03-21 · Active/Ongoing
- Chemtron Research LLC v. Netflix, Inc. — 7:24-cv-00277 · U.S. District Court for the Western District of Texas · filed 2024-11-06 · Active/Ongoing

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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