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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. 8374096 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8374096 (the "8374096 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 8374096: Method for Selecting Antennas and Beams in MIMO Wireless LANs
Title: Method for selecting antennas and beams in MIMO wireless LANs
Assignee: Freedom Patents LLC (Current Assignee), Mitsubishi Electric Research Laboratories Inc (Original Assignee), Mitsubishi Electric Corporation (Previous Assignee)
Inventors: Daqing Gu, Hongyuan Zhang, Jinyun Zhang, Andreas F. Molisch
Filing Date: 2005-11-21
Issue Date: 2013-02-12
Abstract:
A computer-implemented method for selecting antennas in a multiple-input, multiple-output (MIMO) wireless local area network (WLAN) is described. The method involves a station receiving multiple consecutively transmitted sounding packets, each…

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 8374096 Patent:

I have performed a search for US patent 8374096 on the USPTO database.
Here's an analysis of the most relevant prior art cited in US patent 8374096:

US20050232208A1: Transmitting high rate data within a MIMO WLAN
• Full Citation: US20050232208A1 (Hansen Christopher J.)
• Publication Date: October 20, 2005.
• Brief Description: This patent application describes transmitting high-rate data within a MIMO WLAN, which involves transmitting data using multiple antennas.
• Potential Anticipation (35 U.S.C. § 102): This reference potentially anticipates claims related to transmitting data in a MIMO WLAN, particularly aspects concerning the use of multiple antennas and sounding packets that may include data, as broadly described in claims 1 and 9 of US8374096. While US8374096 focuses on antenna selection using sounding packets, the concept of transmitting data concurrently with training information for a MIMO channel is a shared underlying principle.
US20060270343A1: Method and apparatus for antenna mapping selection in MIMO-OFDM wireless networks
• Full Citation: US20060270343A1…

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 US Patent 8,374,096 under 35 U.S.C. § 103
This analysis identifies combinations of prior art references disclosed within the patent document that would render the claims of US patent 8,374,096 obvious to a person having ordinary skill in the art (POSA) as of the filing date (2005-11-21). The primary focus is on Independent Claim 1, which defines the core method.
Independent Claim 1: Key Elements
Independent Claim 1 describes a method for selecting antennas in a MIMO WLAN, comprising:
1. Receiving multiple transmitted sounding packets: Each packet corresponds to a different subset of antennas.
2. Estimating a channel matrix: For each subset of antennas, performed in the station.
3. Sending a frame including an HT control field to initiate selection: Sent after estimating the channel matrix.
4. Selecting a subset of antennas: According to the channel matrices.
5. Specific HT control field mechanism: The HT control field includes an MCS selection feedback (MFB) field. If an Antenna Selection Indicator (ASI) field is set to "1" or a Modulation Coding Scheme…

4. Litigation History of the Patent

Public records reflect that the 8374096 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Freedom Patents LLC v. LG Electronics, Inc. et al. — 4:24-cv-00537 · Eastern District of Texas · filed 2024-06-14 · Dismissed with prejudice (settled)

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]