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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. 8400835 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8400835 (the "8400835 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

Here is a concise summary of US Patent 8,400,835.

Title: Non-volatile semiconductor memory

Assignee: The original assignee was Panasonic Corporation. However, recent litigation documents from a case in the Eastern District of Texas (Advanced Memory Technologies, LLC v. SK Hynix Inc.) indicate that the current assignee is likely Advanced Memory Technologies, LLC. A complete chain of title is not available without a direct search of the USPTO assignment database.

Inventors:

- Yukimasa Hamamoto
- Masahiro Toki

Filing Date: July 25, 2011

Issue Date: March 19, 2013

Abstract: When a plurality of non-volatile memory cells in a memory cell array are simultaneously written, bit lines of the...

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 for U.S. Patent No. 8,400,835

Date of Analysis: April 26, 2026

Patent under Review: U.S. Patent No. 8,400,835 (hereinafter "'835 patent")

Statutory Basis for Analysis: 35 U.S.C. § 103 (Conditions for patentability; non-obvious subject matter)

Introduction

This analysis examines whether the claims of the '835 patent would have been obvious to a person having ordinary skill in the art (PHOSITA) of non-volatile semiconductor memory design at the time the invention was made, considering the prior art cited in the patent's prosecution history. An invention is considered obvious if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a PHOSITA.

The core of the '835 patent's claimed invention lies in a non-volatile semiconductor memory architecture designed to reduce variations in write speed when simultaneously writing to multiple memory cells. This is achieved by providing M data lines connected to the bit lines, with each...

4. Litigation History of the Patent

Public records reflect that the 8400835 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Advanced Memory Technologies, LLC v. SK Hynix Inc. — 2:24-cv-01078 · U.S. District Court for the Eastern District of Texas · filed 2024-12-30 · Active/Pending

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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