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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. 8514815 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8514815 (the "8514815 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 8514815, titled "Training signals for selecting antennas and beams in MIMO wireless LANs," was filed on September 30, 2005, and issued on August 20, 2013. The inventors are Daqing Gu, Hongyuan Zhang, Jinyun Zhang, and Andreas F. Molisch. The current assignee is Freedom Patents LLC, though the patent document notes that listed assignees may be inaccurate and Google has not performed a legal analysis for accuracy. The original assignee was Mitsubishi Electric Research Laboratories Inc.
Abstract:
A computer-implemented method for selecting antennas in a multiple-input, multiple-output (MIMO) wireless local area network (WLAN) involves several steps. It begins with a station sending…

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 8514815 Patent:

The following is an analysis of the most relevant prior art for US patent 8514815, based on the provided patent text and search results. The patent's priority date is September 30, 2005.
Most Relevant Prior Art for US Patent 8514815

US patent 8514815 claims a computer-implemented method for selecting antennas in a MIMO WLAN, involving sending a number of sounding packets for training, transmitting multiple consecutively transmitted sounding packets, receiving these packets (each corresponding to a different antenna subset), estimating a channel matrix, and selecting an antenna subset. The method primarily operates at the MAC layer without requiring PHY layer modification, and the sounding packets can include data.
The most directly relevant prior art cited in US8514815 itself is:
• U.S. patent application Ser. No. 11/127,006, "Training Frames for MIMO Stations," filed by Andreas Molisch, Jianxuan Du and Daqing Gu on May 11, 2005.
Full Citation: US 7,486,720 B2 (granted Feb. 3, 2009) or US 2006/0067277 A1 (published Mar. 30, 2006). The snippet specifically references 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:

Obviousness Analysis under 35 U.S.C. § 103
A patent claim is obvious if "the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious before the effective filing date of the claimed invention to a person having ordinary skill in the art to which the claimed invention pertains" (35 U.S.C. § 103). This analysis requires identifying: (1) the scope and content of the prior art; (2) the differences between the prior art and the claims at issue; (3) the level of ordinary skill in the pertinent art; and (4) secondary considerations of obviousness.
Given the priority date of September 30, 2005, for US8514815, prior art references existing before this date are relevant. Since the patent was filed under pre-AIA rules, the pre-AIA 35 U.S.C. § 102 and § 103 apply to determine prior art status and obviousness.
Identification of Prior Art References
The patent US8514815 itself explicitly cites a number of prior art references in its description:
1. IEEE 802.11n standard (WiFi): This standard, incorporated by reference,…

4. Litigation History of the Patent

Public records reflect that the 8514815 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)

• Freedom Patents, LLC v. Samsung Electronics Co., Ltd. et al. — Eastern District of Texas · filed 2024-06-14 · 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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