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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. 8589587 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8589587 (the "8589587 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

Analysis of U.S. Patent 8,589,587

Washington, D.C. - An analysis of United States Patent 8,589,587, titled "Protocol offload in intelligent network adaptor, including application level signalling," reveals a method for improving the efficiency of data transfer in high-speed networks. The patent is assigned to Chelsio Communications Inc.

Key Patent Details:

- Title: Protocol offload in intelligent network adaptor, including application level signalling
- Assignee: Chelsio Communications Inc.
- Inventors: Dimitrios Michailidis, Wael Noureddine, Felix A. Marti, Asgeir Thor Eiriksson
- Filing Date: May 11, 2007
- Issue Date: November 19, 2013
- Abstract: The patent describes a system where a...

4. Litigation History of the Patent

Public records reflect that the 8589587 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Speednic LLC v. Nvidia Corp et al. — 7:26-cv-00148 · Texas Western District Court · filed

2026-04-16 · Open

3. 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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