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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. 8610573 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8610573 (the "8610573 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.

#### **4. Litigation History of the Patent**

Public records reflect that the 8610573 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Modulus Systems LLC v. Smart & Green — 2:26-cv-00332 · Texas Eastern District Court · filed 2026-04-22 · Open
- Modulus Systems LLC v. Loytec Electronics GMBH — 2:26-cv-00330 · Texas Eastern District Court · filed 2026-04-22 · Open
- Modulus Systems LLC v. Dusun Electron Ltd — 2:26-cv-00329 · Texas Eastern District Court · filed 2026-04-22 · Open
- Modulus Systems LLC v. Sengled Co Ltd — 2:26-cv-00331 · Texas Eastern District Court · filed 2026-04-22 · Open
- Modulus Systems LLC v. Tridonic GMBH & Co KG — 2:26-cv-00333 · Texas Eastern District Court · filed 2026-04-22 · Open
- Modulus Systems LLC v. Coobuy Ltd — 2:26-cv-00328 · Texas Eastern District Court · filed 2026-04-22 · Open

## 2. 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]

**DISCLAIMER. This document is a machine-generated sample. The factual assertions, prior-art citations, and legal arguments above are AI-produced and may contain errors, omissions, or outdated information. Do not transmit this letter, in whole or in part, to any party. This is not legal advice; no attorney-client relationship is created by its existence. Consult a licensed patent attorney before responding to any patent-infringement assertion.**

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