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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. 8613717 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8613717 (the "8613717 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 8,613,717

Date of Analysis: April 26, 2026

This report provides a summary of United States Patent 8,613,717, including its key bibliographic details and a plain-language explanation of its independent claims.

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Bibliographic Information

- Title: Systems and methods for removing and fragmenting undesirable material within a circulatory system
- Assignee: The listed current assignee is Angiodynamics Inc. The original assignee was also Angiodynamics Inc.
- Inventors: Lishan Aklog, Michael Glennon
- Filing Date: April 12, 2011
- Issue Date: December 24, 2013
- Abstract: A method for removing an undesirable material is provided. The method includes maneuvering a...

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

Public records reflect that the 8613717 Patent has been the subject of the following litigation,

which informs our view of the asserted claims and your client's enforcement posture:

• *Angiodynamics Inc v. Endovascular Engineering Inc* — 1:26-cv-00469 · Delaware District Court · filed 2026-04-23 · 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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