

SAMPLE — NOT LEGAL ADVICE. This response letter was generated automatically from publicly available analysis. It has NOT been reviewed by a licensed attorney and SHOULD NOT BE SENT to any party without substantial review and customization by qualified patent counsel. Use as a starting point only.

[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. 8631102 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8631102 (the "8631102 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

I have completed the first step of searching for the patent in the USPTO databases. I will now proceed with the analysis of the patent information and its claims. I do not need to perform another search at this time.

Here is a summary of US Patent 8,631,102:

Title: Automated device provisioning and activation

Assignee: Headwater Partners I LLC

Inventor: Gregory G. Raleigh

Filing Date: Nov. 15, 2012

Issue Date: Jan. 14, 2014

Abstract:

The patent describes a system and method for managing network services on a device. It involves a service processor on the device that communicates with a service controller in the network. This system allows for the monitoring and control of service...

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 8631102 Patent:

I have already completed the initial search for US Patent 8,631,102 and have access to the necessary information, including its claims and the prior art cited by the examiner. Therefore, I do not need to perform another search at this time. I will now proceed to analyze the cited prior art and its relevance to the claims of the patent.

Analysis of Prior Art for U.S. Patent No. 8,631,102

The following is an analysis of the prior art cited during the prosecution of U.S. Patent No. 8,631,102, "Automated device provisioning and activation." This analysis focuses on the most relevant references and their potential to anticipate the independent claims of the '102 patent under 35 U.S.C. § 102.

Key Independent Claims of US Patent 8,631,102:

- Claim 1: Describes a method for a wireless device to manage network usage. This involves a "service processor" on the device that receives a "service profile" from a "service controller" on the network. The service processor then monitors the device's network usage and controls access to services based on the rules in this profile.
- Claim 13:...

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:

Based on my analysis of the prior art cited during the prosecution of U.S. Patent No. 8,631,102, I have prepared the following obviousness analysis for the independent claims of the patent.

Obviousness Analysis of U.S. Patent No. 8,631,102

Introduction

This analysis evaluates the validity of the independent claims of U.S. Patent No. 8,631,102 ("the '102 patent") in light of prior art, specifically under the standard of obviousness as defined in 35 U.S.C. § 103. The '102 patent, filed in 2012 but claiming priority to 2009, describes a system for managing network service usage on a wireless device through a device-side "service processor" that receives and enforces policies from a network-side "service controller."

The key inquiry for obviousness is whether the differences between the claimed invention 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 person having ordinary skill in the art (a "PHOSITA"). This analysis will demonstrate that the core elements of the '102 patent's claims were known in the...

4. Litigation History of the Patent

Public records reflect that the 8631102 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Headwater Research LLC v. AT&T, Inc. — 2:25-cv-00428 · U.S. District Court for the Eastern District of Texas · Dismissed
- Headwater Research LLC v. Deutsche Telekom (Sprint, T-Mobile) — 2:25-cv-00359 · U.S. District Court for the Eastern District of Texas · Likely settled
- Headwater Research LLC v. Verizon (Verizon Wireless) — 2:25-cv-00391 · U.S. District Court for the Eastern District of Texas

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]

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.

Generated May 14, 2026 by ihatepatentrolls.com — sample only.