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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. 8649971 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8649971 (the "8649971 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 8,649,971: Navigation Device

Date of Analysis: April 26, 2026

This report provides a concise summary of United States Patent 8,649,971, including its key bibliographic details and a plain-language overview of its independent claims. Information is based on data from the United States Patent and Trademark Office (USPTO). A search of the 2026 dockets for the Court of Appeals for the Federal Circuit (CAFC) did not yield specific results for this patent.

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Bibliographic Information

- Title: Navigation device
- Assignee: The current assignee of record is Optimum Vector Dynamics LLC. The original assignee was Mitsubishi Electric Corp.
- Inventor: Hiroshi Machino
- ...

## **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 8649971 Patent:

## Analysis of Prior Art for U.S. Patent 8,649,971

Under 35 U.S.C. § 102, a claim is anticipated if every element and limitation of the claim is found, either expressly or inherently, in a single prior art reference. The following analysis examines the most relevant prior art references cited by the USPTO examiner during the prosecution of patent 8,649,971 and assesses their potential to anticipate the independent claims (1 and 19) of the '971 patent.

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### Key Prior Art References Cited by the Examiner

The following patents and patent applications were cited by the examiner as relevant to the claimed invention.

#### 1. U.S. Patent 5,926,118 A (Aisin Aw Co., Ltd.)

- Full Citation: US 5,926,118 A, "Vehicular navigation apparatus," Assignee: Aisin Aw Co., Ltd.
- Filing Date: June 28, 1995
- Publication Date: July 20, 1999
- Brief Description: This patent describes a navigation system that can set a "passing point" (waypoint) and a destination. If the vehicle deviates from the recommended route to the passing point, the system can perform a search for an alternate route. The system...

## 4. Litigation History of the Patent

Public records reflect that the 8649971 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Optimum Vector Dynamics LLC v. Dreame Technology USA Inc — 3:26-cv-02497 · California Southern District Court · filed 2026-04-20 · Open
- Optimum Vector Dynamics LLC v. General Motors Company — 2:23-cv-00175 · U.S. District Court for the Eastern District of Texas · filed 2023-04-21 · ongoing
- Optimum Vector Dynamics LLC v. Ford Motor Company — 2:23-cv-00176 · U.S. District Court for the Eastern District of Texas · filed 2023-04-21 · ongoing
- Untitled case — 2:25-cv-05928 · U.S. District Court for the Central District of California · early stages
- Hyundai Motor Company et al. v. Optimum Vector Dynamics LLC — IPR2024-00173 · Patent Trial and Appeal Board · filed 2023-11-17 · Not instituted

## 4. 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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