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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. 8704762 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8704762 (the "8704762 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

Patent Summary: US 8,704,762

Title: Display device

Assignee: The patent is currently assigned to Paneltouch Technologies LLC. The original assignee was Panasonic Liquid Crystal Display Co., Ltd.

Inventors: Kouichi Anno, Takumi Sato, Masahiro Teramoto

Filing Date: June 2, 2011

Issue Date: April 22, 2014

Abstract:

A display device includes a coordinate input device including a transparent substrate having a first signal interconnect disposed in a region outside a detection region corresponding to a contact position, a first electrode terminal, a flexible interconnect substrate connected to the first electrode terminal, and a display panel for image display based on a video signal from...

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 8704762 Patent:

Analysis of Prior Art for U.S. Patent 8,704,762

As of the current date, May 13, 2026, the following analysis details the most relevant prior art cited against U.S. Patent 8,704,762, titled "Display device." The analysis focuses on the potential for anticipation of the patent's claims under 35 U.S.C. § 102, which pertains to novelty.

The core invention of US Patent 8,704,762 lies in a display device, which includes a coordinate input device (touch panel) or a display panel, featuring a dedicated signal interconnect placed along the periphery of the substrate. This "second" or "fourth" signal interconnect is designed to surround the primary functional areas (the detection region and its associated "first" signal interconnects). Its purpose is to serve as a diagnostic line; by checking its electrical continuity between two dedicated inspection terminals, one can easily detect physical defects like chipping or cracks at the substrate's edge, which might otherwise be difficult to observe visually after assembly.

Below are the most pertinent prior art references cited during the...

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 on the face of US patent 8,704,762 and other analogous art, the independent claims of the '762 patent would likely be rendered obvious under 35 U.S.C. § 103. The core invention—an additional, dedicated conductive line at the periphery of a substrate for detecting cracks or chips—is a combination of a standard display/touch panel structure with a known testing technique from the broader field of electronics manufacturing. A person having ordinary skill in the art (PHOSITA) in display and touch panel design circa 2010-2011 would have been familiar with the problem of substrate chipping during manufacturing and handling, which could sever critical signal interconnects. The motivation to find a simple, low-cost method for detecting such damage before final assembly would have been high.

Obviousness Analysis of Independent Claim 1

Claim 1 describes a display device with a coordinate input device (touch panel) that includes a second signal interconnect acting as a dedicated inspection line for detecting substrate damage. An obviousness...

4. Litigation History of the Patent

Public records reflect that the 8704762 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Paneltouch Technologies LLC v. BOE Technology Group Co., Ltd. — 2:25-cv-00245 · U.S. District Court for the Eastern District of Texas · filed 2025-02-28 · Closed

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]

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