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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 8732085 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8732085 (the "8732085 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

A search of the USPTO database for patent number US8732085B2 provides the following information:

Patent Number: US8732085B2

Title: Proxy card providing indirect funds access

Assignee: Enpulz, L.L.C., Chicago, IL (US) (at the time of issue)

Note: The Google Patents entry shows Paypulz LLC as the "Current Assignee" and Enpulz LLC as the "Original Assignee". For the purpose of this summary, the assignee at the time of issue as listed on the patent document is used.

Inventors: James D. Bennett

Filing Date: October 30, 2012 (Application No. 13/664,136)

Issue Date: May 20, 2014

Abstract: A proxy card used at an ATM, or at any vendor store, that has a legacy point of sale unit or at a store...

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 8732085 Patent:

The provided patent text for US8732085B2 does not explicitly list a "References Cited" or "Prior Art Documents" section, which typically enumerates the prior art considered during its examination. However, the "Description" section of US8732085B2 states: "The present application is a continuation of U.S. Ser. No. 11/834,294 filed Aug. 6, 2007, co-pending, which is incorporated herein by reference in its entirety for all purposes." U.S. Ser. No. 11/834,294 matured into US Patent 8326758B2. As US8732085B2 is a continuation of this earlier application, the prior art cited in US8326758B2 is highly relevant to US8732085B2. To identify the most relevant prior art, a search for US8326758B2's cited references is necessary.

As US8732085B2 is a continuation of U.S. Ser. No. 11/834,294 (which matured into US8326758B2), the prior art cited in US8326758B2 is highly relevant. A review of the patent citations for US8326758B2 reveals numerous prior art documents. The following U.S. patent applications and patents are identified as particularly relevant, given the focus of US8732085B2 on proxy...

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:

Obviousness Analysis of US8732085B2 under 35 U.S.C. § 103

This analysis assesses the obviousness of claims 1, 7, and 16 of US patent 8732085B2, considering the prior art available before its priority date of August 6, 2007.

1. Person Having Ordinary Skill in the Art (PHOSITA)

A person having ordinary skill in the art (PHOSITA) relevant to US8732085B2 would be a professional in financial transaction systems, such as a software engineer, systems architect, or product developer with experience in payment processing, credit/debit card networks, banking IT systems, and point-of-sale (POS) technologies. This individual would be familiar with the operation of credit cards, debit cards, ATMs, POS terminals, and the underlying infrastructure for processing electronic funds transfers. They would also understand the challenges associated with managing multiple financial accounts and ensuring transaction security and convenience.

2. Prior Art References

For this analysis, the primary prior art references considered are:

- U.S. Serial No. 11/834,294 (which issued as US8326758B2, "Proxy...")

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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