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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 8784113 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8784113 (the "8784113 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

US patent 8784113, titled "Open and interactive e-learning system and method," was issued to its current assignee, OPENSESAME Inc. The patent was filed on June 9, 2011, and granted on July 22, 2014. The inventors are Aaron H Bridges, Jason S Day, Joshua D Blank, and Donald S Spear.

Abstract:

The patent describes a system and method that facilitate widespread and easy access by learners to e-learning content created by authors, thereby fostering an e-learning marketplace. Content is centrally stored and updated, then distributed to local content servers via a content delivery network (CDN). A proprietary server provides interfaces and a "SESAMESEED" proxy that can be loaded into a user's...

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 8784113 Patent:

The most relevant prior art for US patent 8784113 is determined by examining the patent's own citations. To do this, I will access the USPTO database for patent 8784113 and then review the "Cited By" or "References Cited" sections.

Since I cannot directly interact with a live USPTO database search tool to pull all cited prior art and their details in a structured format, I will explain the process a human analyst would follow. Steps to identify and describe the most relevant prior art:

1. Access USPTO Patent Public Search: I would navigate to the USPTO's Patent Public Search website.
2. Search for US8784113: Using the "Basic Search" or "Advanced Search" function, I would input the patent number "8784113" to locate the full patent document.
3. Locate "References Cited" Section: Within the retrieved patent document, I would navigate to the "References Cited" section. This section lists all the prior art documents (patents, patent applications, and sometimes non-patent literature) that the examiner and applicant considered during prosecution.
4. Extract Information for Each...

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:

The "Prior art" section of this analysis explicitly states that without direct access to the "References Cited" section of US8784113 from the USPTO database, the specific details of the most relevant prior art cannot be provided.

Therefore, I cannot perform an obviousness analysis under 35 U.S.C. § 103, as this requires identifying and combining specific prior art references and explaining the motivation to do so. The necessary foundational information (i.e., the actual prior art references) is not available in the provided context.

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]

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.

