

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 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 8810803 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8810803 (the "8810803 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

Here's a concise summary of US patent 8810803:

- Title: Lens system
- Assignee: The current assignee is Longhorn Automotive Group LLC. The original assignee was Intellectual Ventures Holding 67 LLC.
- Inventor: Matthew Bell
- Filing Date: April 16, 2012 (for application number US13/448,321)
- Issue Date: August 19, 2014
- Abstract: A fragmented lens system is disclosed for creating an invisible light pattern useful for computer vision systems. The system generates random or semi-random dot patterns, enabling a computer to uniquely identify each patch of a projected pattern. This allows the computer to determine the position and distance of an object by recognizing the illumination pattern...

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 8810803 Patent:

To identify the most relevant prior art for US patent 8810803, I will focus on the patent citations explicitly marked as "Cited by examiner" from the "Citations" section of the Google Patents

record for US8810803. The priority date for US8810803 is November 12, 2007, so any anticipatory prior art must have a publication or filing date before this.

Here's an analysis of the examiner-cited prior art:

Most Relevant Prior Art for US8810803

1. US5418583A

- Full Citation: US5418583A, Matsushita Electric Industrial Co., Ltd., "Optical illumination system and projection display apparatus using the same"
- Publication/Filing Date: Publication: May 23, 1995. Priority: March 31, 1992. (Date is prior to US8810803's priority date of 2007-11-12)
- Brief Description: This patent describes an optical illumination system that uses a light source (e.g., a lamp) and an integrator, such as a fly's eye lens, to obtain uniform illumination. It mentions a lenticular lens array for beam shaping.
- Potential Anticipation (35 U.S.C. § 102): This patent potentially anticipates elements of Claims 1 and 15...

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 US Patent 8810803 Under 35 U.S.C. § 103

This analysis identifies combinations of prior art references that would render the independent claims of US patent 8810803 obvious to a person having ordinary skill in the art (PHOSITA) at the time of the invention (priority date: November 12, 2007). The motivation to combine these references stems from addressing known challenges in computer vision systems, specifically improving object detection and tracking by generating more effective light patterns.

General Obviousness Argument

The disclosed lens system in US8810803 aims to overcome a problem in existing interactive display systems, such as those described in U.S. Pat. No. 7,259,747 (referred to as the '747 patent). The '747 patent teaches a system where a light source projects a pattern of invisible light into a three-dimensional space, and a camera and computer system track objects based on this pattern. The problem identified by US8810803 is that if this projected pattern is "too regular... the object may disappear relative to the background when at a...

4. Litigation History of the Patent

Public records reflect that the 8810803 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Longhorn Automotive Group LLC v. Volvo Car Corp. et al. — US District Court for the Eastern District of Texas · filed 2024-07-31 · active
- Longhorn Automotive Group LLC v. Volvo North America LLC et al. — US District Court for the Eastern District of Texas · filed 2026-03-24 · active
- Petitioner v. Longhorn Automotive Group LLC — IPR2025-00955 · Patent Trial and Appeal Board (PTAB) · Not Instituted - Procedural
- Untitled case — 2:26-cv-00235 · Texas Eastern District Court · Active

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 25, 2026 by ihatepatentrolls.com — sample only.