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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. 8941708 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8941708 (the "8941708 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**

Summary of U.S. Patent 8,941,708

Title: Method, computer-readable storage medium, and apparatus for modifying the layout used by a video composing unit to generate a composite video signal

Assignee: Cisco Technology, Inc.

Inventor: Hakon Skramstad

Filing Date: July 27, 2012

Issue Date: January 27, 2015

Abstract:

In one embodiment, a method that includes providing, on a display, an object configured to be moved by a user along an axis, associating a plurality of predefined layouts with respective intervals along the axis, detecting a user action on the object indicating a position on the axis, and composing, in response to the detecting of the user action, a composite video signal...

## **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 8941708 Patent:

Analysis of Prior Art Cited in U.S. Patent 8,941,708

This analysis details the prior art references cited by the USPTO examiner during the prosecution of U.S. Patent 8,941,708. Each reference is examined for its potential to anticipate the claims of the '708 patent under 35 U.S.C. § 102, which pertains to the novelty of an invention. An invention is not novel if it was already known to the public before the effective filing date of the patent application.

The effective priority date for the '708 patent is July 29, 2011, based on its claim to the benefit of U.S. Provisional Patent Application No. 61/513,190.

Cited U.S. Patent Documents

The following U.S. patents and patent applications were cited as relevant prior art:

- U.S. Patent No. 7,321,384 B1

Full Citation: Wu, et al., "Method and apparatus for using far end camera control (FECC) messages to implement participant and layout selection in a multipoint videoconference," issued January 22, 2008. Assignee: Cisco Technology, Inc.

Filing Date: June 3, 2003.

Description: This patent describes a system where Far End Camera...

### **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:

Analysis of Obviousness for U.S. Patent 8,941,708

Introduction to Obviousness Standard

Under 35 U.S.C. § 103, a patent claim is considered obvious if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (POSITA). This analysis is not based on hindsight but on the perspective of a skilled artisan with knowledge of the relevant prior art before the invention's priority date of July 29, 2011. An obviousness rejection often involves combining multiple prior art references, but there must be a reasoned motivation to combine them.

Deconstruction of Independent Claims of U.S. Patent 8,941,708

The independent claims (1, 10, 16, and 17) of the '708 patent revolve around a central concept: a user interface for modifying video conference layouts. The key elements are:

1. A movable object on a display: A graphical element, such as a slider or a thumb, that a user can manipulate.
2. An axis of movement: A defined path along which the...

### **4. Litigation History of the Patent**

Public records reflect that the 8941708 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Cisco Systems, Inc. et al. v. Intelligent Protection Management Corp. — 1:25-cv-00271 · U.S. District Court for the District of Delaware · filed 2025-03-07 · 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]

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