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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. 8972576 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8972576 (the "8972576 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 is a concise summary of US Patent 8,972,576.

Summary of US Patent 8,972,576

Title: Establishing a home relationship between a wireless device and a server in a wireless network

Assignee: As of the latest assignment records, the current assignee is IoT Innovations LLC.

Inventor(s): Eric C. Anderson

Filing Date: April 28, 2004

Issue Date: March 3, 2015

Abstract:

A method and system for establishing a persistent relationship between a mobile device and a server in a network is provided. Aspects of the invention include detecting the presence of the mobile device, and in response to determining that the device is unrecognized, automatically notifying a network administrator. In...

4. Litigation History of the Patent

Public records reflect that the 8972576 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- IOT Innovations LLC v. Schneider USA Inc — 2:26-cv-00334 · Texas Eastern District Court · filed 2026-04-23 · Open
- IoT Innovations LLC v. SimpliSafe, Inc. — 1:23-cv-10352 · U.S. District Court for the District of Massachusetts · filed 2023-02-21 · ongoing
- IoT Innovations LLC v. Savant Systems, Inc. — 1:23-cv-12528 · U.S. District Court for the District of Massachusetts · filed 2023-10-30 · settled
- IoT Innovations LLC v. Somfy Systems, Inc. et al. — 9:23-cv-81528 · U.S. District Court for the Southern District of Florida · filed 2023-12-01 · dismissed
- IoT Innovations LLC v. Monitronics International, Inc. — 2:23-cv-00453 · U.S. District Court for the Eastern District of Texas · ongoing
- IoT Innovations LLC v. Snap One, LLC — 2:24-cv-00704 · U.S. District Court for the Eastern District of Texas · ongoing
- IoT Innovations LLC v. Resideo Technologies, Inc. — 2:25-cv-00239 · U.S. District Court for the Eastern District of Texas · filed 2025-02-25 · ongoing

3. 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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