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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. 8976714 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 8976714 (the "8976714 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 8976714: Providing and acquiring a system information message in a wireless network

Title: Providing and acquiring a system information message in a wireless network

Current Assignee: Integral Wireless Technologies LLC

Inventors: Chandrika Worrall

Filing Date: 2009-12-09

Issue Date: 2015-03-10

Abstract: A system and method for receiving a system information (SI) message are disclosed. A user equipment (UE) is configured to receive SI-window length information within a System Information Block Type 1 (SI type 1) message. The UE determines a downlink (DL) subframe where an SI message begins based on the number of DL subframes in a radio frame. The UE is then configured to...

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 8976714 Patent:

To identify the most relevant prior art for US patent 8976714, I will search the USPTO Patent

Public Search database. I will look for the "Cited By" or "References Cited" section of US8976714 to find the prior art references listed by the examiner and applicant. For each identified prior art reference, I will extract the full citation, publication/filing date, and a brief description of its relevance to US8976714, with an assessment of which claims it potentially anticipates under 35 U.S.C. § 102.

US Patent 8976714 Prior Art Analysis

To provide the most relevant prior art for US Patent 8976714, it is necessary to examine the "References Cited" section of the patent document itself, as these are the documents that the patent examiner and the applicant considered relevant during the prosecution of the patent. The USPTO's Patent Public Search tool is the authoritative source for this information.

As of the current date, April 26, 2026, a direct search for the cited references within US Patent 8976714 on the USPTO Patent Public Search platform is required to obtain this specific...

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 8976714 under 35 U.S.C. § 103

US Patent 8976714 claims a system and method for providing and acquiring system information (SI) messages in a wireless network, particularly addressing issues within LTE Time-Division Duplex (TDD) systems. The core invention lies in determining the start time or duration of a System Information (SI) window based on the availability for downlink transmissions, thereby preventing SI message blocking and ensuring equal reception reliability in TDD networks.

A person having ordinary skill in the art (PHOSITA) in wireless communication systems, at the time of the invention, would have been familiar with the 3GPP Long Term Evolution (LTE) standard and its associated technical specifications.

Combination of Prior Art References

The independent claims of US 8976714, specifically Independent Claims 1 (Network Element) and 5 (Wireless Subscriber Communication Unit), would likely be rendered obvious by combining the following prior art references:

1. 3GPP Technical Specification (TS) 36.331: This document outlines the...

4. Litigation History of the Patent

Public records reflect that the 8976714 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Integral Wireless Technologies LLC v. AT&T Inc. — 2:26-cv-00198 · Texas Eastern District Court · Active litigation
- Integral Wireless Technologies LLC v. T-Mobile US, Inc. — 2:25-cv-00945 · Texas Eastern District Court · Active litigation
- Integral Wireless Technologies LLC v. Verizon Communications Inc. — 2:25-cv-00644 · Texas Eastern District Court · Active litigation

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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