

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 14, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 9119038 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9119038 (the "9119038 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

An analysis of US Patent 9,119,038 reveals the following information:

Title: Systems and methods for comparative geofencing.

Assignee: Yopima LLC.

Inventors: Vernell Woods, Dennis Campbell, Troy Nunnally, Travis Nunnally, Alexander Mims.

Filing Date: May 21, 2013.

Issue Date: August 25, 2015.

Abstract:

The patent describes systems and methods for geolocation queries that are based on time, using designated planned arrival and/or departure times or event start and end times. This approach aims to reduce the number of queries to conserve battery, bandwidth, and processing power. It also allows for an increased rate of queries within a specific time frame to achieve higher resolution...

4. Litigation History of the Patent

Public records reflect that the 9119038 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Yopima LLC v. E2open Parent Holdings Inc — 3:26-cv-01295 · Texas Northern District Court ·

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]

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.