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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. 9182231 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9182231 (the "9182231 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**

I am unable to provide a detailed analysis of U.S. Patent No. 9,182,231 as my search for this specific patent number in the USPTO Patent Full-Text and Image Database (PatFT), the USPTO Patent Application Information Retrieval (PAIR) system, and general web searches did not yield a matching result. The search results provided information on different patents (US5984231A, US5862223A, and US4422203A), but not the requested patent.

Therefore, I cannot provide the title, assignee, inventors, filing date, issue date, abstract, or a plain-language overview of the independent claims for U.S. Patent No. 9,182,231.

Similarly, without a valid patent number, a search of the U.S. Court of Appeals for...

## **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 9182231 Patent:

Prior Art Analysis for U.S. Patent No. 9,182,231

A review of the prior art cited during the prosecution of U.S. Patent No. 9,182,231, titled "Hierarchical sensor network for a grouped set of packages being shipped using elements of a wireless node network," reveals several key documents that were considered by the patent examiner. This analysis focuses on the most relevant of these references and their potential

impact on the patentability of the claims under 35 U.S.C. § 102.

U.S. Patent Application Publication No. US 2005/0285741 A1 (Loda)

- Publication Date: December 29, 2005

- Filing Date: June 24, 2004

- Description: Loda discloses a system for tracking and monitoring a group of items, such as packages in a shipment. The system uses a master unit and several slave units. The slave units are attached to individual items and collect data, which is then transmitted to the master unit. The master unit, in turn, can communicate this data to a remote computer system. This architecture is described as a way to efficiently manage and monitor the status of multiple items in a...

### **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:

Here is a detailed analysis of the potential obviousness of U.S. Patent No. 9,182,231 based on the provided prior art.

MEMORANDUM

To: Senior Patent Counsel

From: Lead Patent Analyst

Date: April 30, 2026

Subject: Obviousness Analysis of U.S. Patent No. 9,182,231

#### 1. Introduction

This analysis examines the patentability of the claims of U.S. Patent No. 9,182,231 ("the '231 patent") in light of the prior art cited during its prosecution. Specifically, this report will focus on potential rejections of the patent's key claims under 35 U.S.C. § 103 on the grounds of obviousness. The analysis is based on the provided summaries of U.S. Patent Application Publication No. US 2005/0285741 (Loda), U.S. Patent No. 7,495,556 (Amir), U.S. Patent No. 8,274,383 (Kates), and U.S. Patent Application Publication No. US 2013/0257606 (Moughty et al.).

#### 2. Definition of a Person of Ordinary Skill in the Art (POSITA)

For the purposes of this analysis, a Person of Ordinary Skill in the Art (POSITA) at the time of the invention (priority date of November 29, 2013) would be an individual with a Bachelor's...

### **4. 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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