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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 9247299 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9247299 (the "9247299 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's a concise summary of US Patent 9247299, based on the provided authoritative patent text and a search for CAFC dockets:

US Patent 9247299

- Title: Method and system for television channel group
- Current Assignee: Innobrilliance LLC
- Inventors: Chi Fai Ho, Shin Cheung Simon Chiu
- Filing Date: November 4, 2014 (Application No. US14/533,088)
- Issue Date: January 26, 2016
- Abstract: The patent describes a method and system for displaying video from multiple video streams on a television display. It involves an input interface receiving video data and a frame controller displaying this data in separate, non-overlapping frames (pictures) on the screen. The frame controller also...

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 9247299 Patent:

To identify the most relevant prior art for US Patent 9247299, I will examine the "Citations"

section of the patent document, which lists references cited by the examiner and/or third parties. These are generally considered by the USPTO to be relevant existing technology that may anticipate or render obvious the claimed invention.

Here are the patent citations listed for US9247299, along with a brief description and potential claim anticipation:

Cited Prior Art for US9247299

1. US20020013941A1

- Full Citation: US20020013941A1 (Ward, Thomas E.)
- Publication Date: 2002-01-31
- Brief Description: This patent application describes a "V-chip plus +" system with an in-guide user interface apparatus and method. It focuses on parental control and program selection within an electronic program guide, allowing users to block or filter content based on ratings. While it involves program selection, its primary focus is not on displaying multiple distinct video streams in separate frames with a grouped channel feature based on common attributes.
- Potential Claim(s) Anticipated (35 U.S.C. §...

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's an analysis of the obviousness of US Patent 9247299 under 35 U.S.C. § 103, focusing on combinations of prior art references cited in the patent. The analysis considers the priority date of US9247299, which is April 2, 2007.

Independent Claims Under Analysis:

The primary independent claims are Claim 1 (television system) and Claim 13 (method for displaying video data). Both claims share the following core elements:

- A television system/method for displaying video data from a plurality of video streams on a display.
- A frame controller causing the video data to be displayed in a plurality of separate pictures, where each picture occupies an area of the display separate from an area occupied by any other picture (i.e., non-overlapping, unlike traditional Picture-in-Picture (PIP)).
- The frame controller receives a first user selection to display a video group related to an attribute, the video group comprising at least a first and a second video stream.
- The first and second video streams of the video group are received and displayed in corresponding first and second...

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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