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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. 9281314B1 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9281314B1 (the "9281314B1 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

A non-volatile storage device with an oxide/nitride sidewall is disclosed in U.S. Patent No. 9,281,314 B1. The patent, assigned to Palisade Technologies LLP, aims to improve the performance and reliability of memory devices by using a specific fabrication method.

Patent Details:

- Title: Non-volatile storage having oxide/nitride sidewall
- Assignee: Palisade Technologies LLP
- Inventors: Takashi Kashimura, Xiaolong Hu, Sayako Nagamine, Yusuke Yoshida, Hiroaki Iuchi, Akira Nakada, Kazutaka Yoshizawa
- Filing Date: October 10, 2014
- Issue Date: March 8, 2016
- Abstract: The patent describes non-volatile storage devices and methods for their fabrication. Sidewalls of memory cells and their...

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 9281314B1 Patent:

Based on your request, here is a detailed analysis of the prior art cited on the face of U.S.

Patent No. 9,281,314 B1.

Analysis of Prior Art Cited in U.S. Patent No. 9,281,314 B1

This analysis examines the prior art references cited by the USPTO examiner during the prosecution of the '314 patent. The core inventive concept of the '314 patent, as detailed in the independent claims, involves a non-volatile memory device and its manufacturing method. The key feature is the selective formation of a protective silicon nitride layer on the sidewalls of the word lines, but not on the sidewalls of the charge storage regions, which are instead insulated by an air gap. This is achieved using a sacrificial layer that is deposited and then etched back to a specific height before the nitride deposition.

The following is an assessment of the most relevant cited patents and their potential to anticipate the claims of the '314 patent under 35 U.S.C. § 102.

1. U.S. Patent No. 8,633,546 B2 (Lee et al.)

• Full Citation: U.S. Patent No. 8,633,546 B2, "Semiconductor device and method for..."

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:

Analysis of Obviousness for U.S. Patent No. 9,281,314 B1

To: File

From: Senior Patent Analyst

Date: May 13, 2026

Subject: Obviousness Analysis of U.S. Patent No. 9,281,314 B1

1. Introduction and Scope

This report provides an analysis of the potential obviousness of the claims of U.S. Patent No. 9,281,314 B1 (hereafter, "the '314 patent") under 35 U.S.C. § 103. The analysis is based on prior art references cited during the patent's prosecution and other publicly available documents preceding the patent's priority date of October 10, 2014.

A Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention would be an engineer or scientist with a Master's degree in electrical engineering, materials science, or a related field, and 2-3 years of experience in semiconductor device fabrication, particularly in the area of non-volatile memory. Alternatively, a PHOSITA could have a Bachelor's degree and 5+ years of direct experience in the field. Such a person would be familiar with standard deposition, etching, and patterning techniques (e.g., CVD, PVD, RIE), as well...

4. Litigation History of the Patent

Public records reflect that the 9281314B1 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Palisade Technologies, LLP v. Micron Technology, Inc. et al. — 7:24-cv-00262 · U.S. District Court for the Western District of Texas · filed 2024-10-16 · Dismissed with prejudice

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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