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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. 9290153 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9290153 (the "9290153 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

Patent Analysis: US 9,290,153 B2

Date of Analysis: April 26, 2026

Patent Number: 9,290,153 (Note: Interpreted literally as provided)

Title: Vehicle-based multimode discovery

Key Patent-at-a-Glance:

- Assignee: AutoConnect Holdings LLC
- Inventors: Christopher P. Ricci, Octavian Chincisan, Alisher I. Yusupov
- Filing Date: April 13, 2015
- Issue Date: March 22, 2016
- Abstract: "A vehicle includes a processor and a memory, the memory in communication with the processor, the memory having instructions stored thereon, that when executed by the processor, are configured to: when a computational device is detected, establish a communication link with the computational device over a first...

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 9290153 Patent:

Analysis of Prior Art Cited in U.S. Patent No. 9,290,153

To: File

From: Senior Patent Analyst

Date: May 1, 2026

Subject: Prior Art Analysis for U.S. Patent No. 9,290,153 B2

This analysis details the most relevant prior art references cited during the prosecution of U.S. Patent No. 9,290,153 ("the '153 patent"). Each reference is evaluated for its potential to anticipate the independent claims of the '153 patent under 35 U.S.C. § 102. For anticipation to apply, a single prior art reference must disclose, either expressly or inherently, each and every element of a claimed invention.

The core elements of the independent claims (1, 9, and 17) of the '153 patent are:

- (a) A vehicle's processor detects a computational device.
- (b) A first wireless communication link is established using a first protocol (e.g., Bluetooth).
- (c) The processor determines the device is within a predetermined physical proximity based on the signal strength of the first link.
- (d) A second, different wireless communication link (e.g., Wi-Fi) is established when the device is determined to be within...

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:

{"answer":"### Analysis of Obviousness for U.S. Patent No. 9,290,153

To: File

From: Senior Patent Analyst

Date: May 1, 2026

Subject: Obviousness Analysis of U.S. Patent No. 9,290,153 B2

1. Introduction and Legal Standard

This analysis examines the patentability of the claims of U.S. Patent No. 9,290,153 ("the '153 patent") in light of prior art, under the framework of 35 U.S.C. § 103. A patent claim is considered obvious if the differences between the claimed invention and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art (POSA).

The '153 patent, with a priority date of March 14, 2012, describes a method and system for a vehicle to establish a low-power wireless connection (e.g., Bluetooth) with a user's device and, upon determining the device is within a certain proximity based on signal strength, automatically establishing a second, higher-bandwidth connection (e.g., Wi-Fi).

A POSA in this field at the time of the invention would likely have a Bachelor's degree...

4. Litigation History of the Patent

Public records reflect that the 9290153 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- AutoConnect Holdings LLC v. General Motors Company — 6:23-cv-00537 · U.S. District Court

for the Western District of Texas · filed 2023-07-26 · active

- AutoConnect Holdings LLC v. Hyundai Motor America et al. — 2:24-cv-00802 · U.S. District Court for the Eastern District of Texas · filed 2024-10-18 · active and pending
- AutoConnect Holdings LLC v. Volkswagen Group of America, Inc. et al. — 2:24-cv-00877 · U.S. District Court for the Eastern District of Texas · filed 2024-11-08 · active and pending
- AutoConnect Holdings LLC v. Ford Motor Company — 1:24-cv-01327 · U.S. District Court for the District of Delaware · filed 2024-11-06 · active and pending
- General Motors Company v. AutoConnect Holdings LLC — IPR2025-01383 · U.S. Patent and Trademark Office, Patent Trial and Appeal Board · filed 2024-10-04 · instituted

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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