

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. 9352229 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9352229 (the "9352229 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 Information

I am unable to directly access and search the USPTO database or CAFC dockets. However, I can provide a summary of U.S. Patent 9,352,229 based on the information that is publicly available.

Here is a summary of U.S. Patent 9,352,229:

Title: Controller for a games console

Assignee: Ironburg Inventions Ltd.

Inventors: Simon Burgess, Duncan Ironmonger.

Filing Date: June 11, 2015

Issue Date: May 31, 2016

Abstract: The patent describes a hand-held controller for a gaming console. The controller has an outer case and multiple controls on its front and top surfaces. It's designed to be held with both hands, with the thumbs operating the front controls and the index...

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 9352229 Patent:

To provide a comprehensive analysis of the prior art for U.S. Patent No. 9,352,229, I will need to access the full patent document, including its claims and the "References Cited" section. I will then analyze each of the cited references to determine their relevance and potential impact on the patentability of the claims.

I will now proceed with the following steps:

1. Retrieve the full text and a list of citations for US Patent 9,352,229 from the USPTO database.
2. Examine each cited patent and publication to understand the technology it discloses.
3. Compare the teachings of each prior art document with the claims of US Patent 9,352,229.
4. Present the findings in a clear and organized format, detailing each relevant prior art reference and the specific claims it may anticipate.

I will now execute the first step of this plan.

An analysis of the prior art cited in U.S. Patent No. 9,352,229, titled "Controller for a games console," reveals several key patents that could be considered relevant to the claims of the '229 patent. Below is a detailed breakdown of these prior art...

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:

Obviousness Analysis of U.S. Patent No. 9,352,229

To: In-house Counsel

From: Senior Patent Analyst

Date: May 09, 2026

Subject: Obviousness Analysis of U.S. Patent No. 9,352,229 B2

I. Introduction

This report provides an analysis of the obviousness of U.S. Patent No. 9,352,229 B2 ("the '229 patent"), titled "Controller for a games console," under 35 U.S.C. § 103. The '229 patent, assigned to Ironburg Inventions Ltd., describes a hand-held game controller with additional, repositioned controls on its rear surface, intended to be operated by the user's middle fingers. This analysis is based on a review of prior art references cited in the patent's file history and other publicly available documents. The core inventive concept of the '229 patent appears to be the placement of elongate, flexible paddle-like controls within channels on the back of the controller to allow for actuation of game functions without removing thumbs from the analog sticks.

II. Analysis of Independent Claims

The '229 patent contains six independent claims, which can be grouped by their core inventive...

4. Litigation History of the Patent

Public records reflect that the 9352229 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Ironburg Inventions Ltd. v. Valve Corporation — 1:15-cv-04219 · U.S. District Court for the Northern District of Georgia · filed 2015-12-03 · Transferred

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]

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.

Generated May 14, 2026 by ihatepatentrolls.com — sample only.