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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

June 1, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 9448367B2 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9448367B2 (the "9448367B2 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 9448367B2:

Title: Multi-channel optical transceiver module including dual fiber type direct link adapter for optically coupling optical subassemblies in the transceiver module

Assignee: Applied Optoelectronics Inc. (Original Assignee); currently assigned to BOKF, NA D/B/A BOK FINANCIAL (Security Interest as of 2025-08-01)

Inventors: I-Lung Ho, Stefan J. Murry, Che-Shou (Richard) YEH

Filing Date: October 15, 2015

Issue Date: September 20, 2016

Abstract: A multi-channel optical transceiver includes a multi-channel transmitter optical subassembly (TOSA), a multi-channel receiver optical subassembly (ROSA), and a dual fiber type direct link adapter...

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 9448367B2 Patent:

The USPTO defines "prior art" as existing technology or inventions that demonstrate similar or related functionality to a claimed invention. It is used to determine if an invention is novel and

non-obvious. Prior art is not limited to granted patents but includes any publicly available information before a patent application is filed, such as published patents, patent applications, research papers, or commercial products.

I will now list the prior art cited in US Patent 9448367B2, along with their publication/filing dates, a brief description, and which claims they potentially anticipate under 35 U.S.C. § 102.

Cited Prior Art for US9448367B2:

1. US5363460A

Full Citation: US5363460A - Sleeve portion for an optical fibre plug connector

Publication/Filing Date: Publication: 1994-11-08; Priority: 1992-11-26

Brief Description: This patent describes a sleeve portion for an optical fiber plug connector. It focuses on the mechanical aspects of aligning and connecting optical fibers within a connector system.

Potential Anticipated Claims (35 U.S.C. § 102): Claims 1, 2, 4, 5, 6, 7, 8,...

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:

To analyze the obviousness of US Patent 9448367B2 under 35 U.S.C. § 103, we must consider whether the differences between the claimed invention and the prior art would have been obvious at the time the invention was made to a person having ordinary skill in the art (PHOSITA). A PHOSITA in this field would possess knowledge of fiber optic connector design, optical subassembly packaging, wavelength division multiplexing (WDM) systems, and the design constraints of small form-factor optical modules for applications like Optical Line Terminals (OLTs) in Passive Optical Networks (PONs). They would also be familiar with standard optical connector types (e.g., LC connectors) and techniques for internal fiber routing and coupling within transceivers.

The '367 patent aims to provide a compact solution for optically coupling multi-channel optical subassemblies (TOSAs and ROSAs) to external pluggable optical connectors within a small form-factor transceiver module, specifically by using a "dual fiber type direct link adapter." The term "direct link" is defined as optically coupling with a...

4. Litigation History of the Patent

Public records reflect that the 9448367B2 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Eoptolink Technology USA Inc. v. Applied Optoelectronics, Inc. — IPR2026-00019 · Patent Trial and Appeal Board (PTAB) · filed 2025-10-10 · Not Instituted - Procedural
- Applied Optoelectronics, Inc. v. Eoptolink Technology USA Inc. — 5:24-cv-08165-NW · United States District Court, Northern District of California, San Jose Division · Stayed
- Untitled case — 5:24-cv-08165 · California Northern District Court · Litigation is ongoing

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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