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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. 9503421 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9503421 (the "9503421 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

An analysis of US Patent 9503421 reveals the following details regarding its prosecution, claims, and legal status.

Title: Security information and event management

Assignee: The current assignee of record is Athena Security LLP. The original assignee was Fortinet Inc.

Inventors: Dong Liang

Filing Date: March 17, 2014

Issue Date: November 22, 2016

Abstract: The patent describes systems and methods for a Security Information and Event Management (SIEM) device to automatically conduct complex tasks through "work flows." These work flows consist of multiple security tasks performed by one or more security devices. The SIEM device initiates the work flow either in response to a security...

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 9503421 Patent:

Analysis of Prior Art for U.S. Patent 9,503,421

As part of the examination process before the U.S. Patent and Trademark Office (USPTO), several prior art references were cited against the application that matured into patent 9,503,421. These references represent the technological landscape at the time of the invention and were considered by the patent examiner to determine the novelty and non-obviousness of the claimed subject matter.

The core inventive concept of patent 9,503,421, particularly in its independent claims 1 and 11, resides in a Security Information and Event Management (SIEM) system that uses a "work flow template" containing "abstract tasks." A key component, the "device engine," translates these abstract tasks into specific, executable tasks for particular security devices. This allows for a flexible, vendor-agnostic approach to automating complex security procedures.

For a prior art reference to anticipate a claim under 35 U.S.C. § 102, it must disclose, either expressly or inherently, every element of that claim arranged as in the claim. The following is an...

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. 9,503,421 under 35 U.S.C. § 103

This analysis evaluates whether the invention claimed in U.S. Patent No. 9,503,421 would have been obvious to a Person Having Ordinary Skill in the Art (PHOSITA) at the time of the invention, March 17, 2014. An invention 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 to a PHOSITA. This analysis relies on combining teachings from multiple prior art references, for which there must have been a reasoned motivation to combine.

The central inventive concept of US 9,503,421, as defined in independent claims 1 and 11, is a specific architecture for automating security workflows. This architecture is characterized by three key elements working in concert:

1. A "work flow template" that defines a general sequence of security functions.
2. The use of "abstract tasks" within the template, which describe what to do (e.g., "scan host for vulnerabilities") rather than the device-specific command for how to do it.
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4. Litigation History of the Patent

Public records reflect that the 9503421 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Athena Security Inc v. Google LLC — 7:26-cv-00158 · Texas Western District Court · filed 2026-04-20 · Open
- Athena Security, LLP v. Amazon.com, Inc. et al. — 7:26-cv-00061 · U.S. District Court for the Western District of Texas · filed 2026-02-20 · Open
- Fortinet, Inc. v. Palo Alto Networks, Inc. — 3:20-cv-03343 · U.S. District Court for the Northern District of California · filed 2020-05-19 · Terminated

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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