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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. 9518604 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9518604 (the "9518604 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 U.S. Patent 9,518,604 reveals the following information.

Title: Fluid bearings

Assignee: Metso Finland Oy

Inventors: Daniel Braithwaite, Jeffrey Victor Belke, Nicholas John Green, Chris Tate, Oscar Harrison, Knut Vaage

Filing Date: June 28, 2013

Issue Date: December 13, 2016

Abstract: The present invention provides improvements to a fluid bearing for a journal, one being a polymer bearing pad with an outer surface, at least one recess for receiving lubricating fluid from a base of the fluid bearing and distributing the lubricating fluid to the outer surface and a mount for securely mounting the polymer bearing pad to the base. Other improvements include a fluid bearing...

## **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 9518604 Patent:

Prior Art Analysis for U.S. Patent 9,518,604

This analysis examines the prior art cited during the prosecution of U.S. Patent 9,518,604. Each cited reference is evaluated for its potential to anticipate the claims of the '604 patent under 35 U.S.C. § 102. Under this statute, a claim is anticipated if every element and limitation of the claim is found, either expressly or inherently, in a single prior art reference.

The '604 patent, with a priority date of June 28, 2012, and a filing date of June 28, 2013, introduces a fluid bearing assembly, particularly for grinding mills, that utilizes a polymer bearing pad. Key features across its independent claims include the use of a polymer pad with a lubricating fluid recess, methods of mounting this pad to a base, the inclusion of a chamfer on the pad's edge to retain lubricant, and a multi-directional bearing configuration.

The following prior art references were cited by the examiner during the patent's prosecution:

1. US 3,744,868 A: Hydrostatic Bearing Pad Assembly

- Publication Date: July 10, 1973

- Filing Date: October 26, 1971

- ...

### **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. 9,518,604

Introduction

This analysis examines the patentability of the claims in U.S. Patent No. 9,518,604 ("the '604 patent") under 35 U.S.C. § 103, which pertains to obviousness. The '604 patent, titled "Fluid bearings," was filed on June 28, 2013, and claims a priority date of June 28, 2012. Therefore, any prior art considered for this analysis must have been publicly available before this priority date.

The core of the invention as described in the '604 patent relates to fluid bearings, particularly for heavy-duty applications like grinding mills, which utilize a polymer bearing pad mounted on a base. Key features highlighted in the claims include the use of polymer pads, specific mounting mechanisms, the presence of a chamfer on the pad's edge to manage lubricant, and a multi-directional bearing design.

An initial review of the patent's file history and cited references reveals several key prior art documents that, when combined, suggest that the claimed inventions would have been obvious to a Person Having Ordinary Skill in the Art...

### **4. Litigation History of the Patent**

Public records reflect that the 9518604 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- FLSmidth Inc. v. Metso Finland Oy — IPR2025-00985 · United States Patent and Trademark Office, Patent Trial and Appeal Board · filed 2025-05-14 · 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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