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[Your Name]

[Your Title]

[Your Company]

[Street Address, City, State ZIP]

May 25, 2026

[Opposing Counsel Name]

[Firm Name]

[Address]

Re: U.S. Patent No. 9532164 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9532164 (the "9532164 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

US patent 9532164, titled "Mashing mapping content displayed on mobile devices," was issued on December 27, 2016, from an application filed on August 3, 2013. The current assignee is Nearby Systems LLC, with Empire IP LLC listed as the original assignee. The inventors are Gabriel Jakobson and Steven L. Rueben.

The abstract describes a method and apparatus for combining addressable information from various applications on a mobile device onto an existing map. When a user selects addressable information (e.g., a location name or address from a website or email) and invokes a mapping command, a map-display application (such as Google Maps, Waze, or iOS maps) is automatically presented. This...

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 9532164 Patent:

To identify the most relevant prior art for US patent 9532164, I will review the cited references. The Google Patents page for US9532164 provides a list of "Cited by examiner" and "Cited by third party" documents. I will focus on the examiner citations as they were considered by the patent office during prosecution.

Please note that a definitive assessment of anticipation under 35 U.S.C. § 102 would require a detailed claim-by-claim analysis, which is beyond the scope of this response. The following identifies potential areas of overlap.

Here are the most relevant prior art citations for US patent 9532164 based on the information provided by Google Patents:

Parent Application:

- Full Citation: US 2009/0100342 A1 (Jakobson et al.)
- Publication/Filing Date: Claims priority to U.S. patent application Ser. No. 11/974,258 filed Oct. 12, 2007.
- Brief Description: This is the parent application from which US9532164 claims priority. It relates to "relaying address information to a mapping application and/or mapping service for display on a common map." It describes the background of...

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 under 35 U.S.C. § 103

An invention is considered obvious under 35 U.S.C. § 103 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 (PHOSITA). This analysis considers the scope and content of the prior art, differences between the prior art and the claims, the level of ordinary skill in the art, and any secondary considerations of non-obviousness. A conclusion of obviousness can be supported by various rationales, such as combining prior art elements to yield predictable results, or using a known technique to improve similar devices in the same way.

As previously noted, the PTAB denied institution of IPR2022-00808, which challenged claims 1, 10, 16, 22, and 25 as unpatentable under 35 U.S.C. § 103(a) over combinations of US 2007/0055452 A1 (Schluger) and US 2005/0149265 A1 (Brimhall), among others. The PTAB found that Unified Patents had not demonstrated a reasonable likelihood of prevailing. This...

4. 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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