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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. 9667337 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9667337 (the "9667337 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

Analysis of U.S. Patent 9,667,337

Date of Analysis: April 26, 2026

This report provides a concise summary of United States Patent 9,667,337, including its key bibliographic information and a plain-language overview of its independent claims.

Bibliographic Information:

- Title: Intelligent broadband relay for wireless networks for connectivity to mobile or portable devices
- Assignee: At the time of this report, the assignee of record is Massively Broadband LLC.
- Inventors: Theodore S. Rappaport
- Filing Date: November 13, 2014
- Issue Date: May 30, 2017
- Abstract: An ultrawideband radio transceiver/repeater provides a low cost infrastructure solution that merges wireless and wired...

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 9667337 Patent:

Analysis of Prior Art for U.S. Patent 9,667,337

Date of Analysis: May 13, 2026

This analysis details the prior art cited against U.S. Patent 9,667,337, titled "Intelligent broadband relay for wireless networks for connectivity to mobile or portable devices." The patent's core invention, as defined by its independent claim, is a method for a wireless relay to intelligently manage data traffic by identifying the application type of the data and prioritizing its retransmission based on preset instructions.

The following table outlines the most relevant prior art references and their potential impact on the claims of the '337 patent under 35 U.S.C. § 102 (anticipation).

| Citation (Patent No.) | Publication/Filing Date | Brief Description | Claim(s) Potentially Anticipated |

|---|---|---|---|

| US 6,721,546 B1 | Pub. Date: Apr. 13, 2004
File Date: Oct. 30, 2000 | Discloses a communication system with a relay station that can identify the type of data being transmitted (e.g., voice, video, data) and apply a corresponding Quality of Service (QoS) level. The relay can prioritize...

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 9,667,337 under 35 U.S.C. § 103

Date of Analysis: May 13, 2026

This analysis examines the obviousness of the independent claims of U.S. Patent 9,667,337 ('337 patent) in light of prior art available before the patent's earliest priority date of August 22, 2003. The analysis concludes that the claims would have been obvious to a Person of Ordinary Skill in the Art (POSITA).

The single independent claim, Claim 1, recites a method for a wireless relay that involves:

1. Receiving data associated with an application.
2. Determining the type of application from the data.
3. Establishing a priority for retransmitting the data based on the application type and preset instructions.
4. Retransmitting the data based on that established priority.

The core of the invention is an intelligent wireless relay that performs application-aware Quality of Service (QoS) filtering to prioritize traffic. This functionality would have been an obvious development to a POSITA by combining known elements from prior art for predictable results.

Proposed Combination...

4. Litigation History of the Patent

Public records reflect that the 9667337 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Massively Broadband LLC v. Samsung Electronics Co., Ltd. et al. — 2:25-cv-00608 · U.S. District Court for the Eastern District of Texas · filed 2025-06-06 · 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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