[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. 9667751 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9667751 (the "9667751 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 9667751, titled "Data feed acceleration," was issued to Realtime Data LLC. The inventors listed are James J. Fallon, Paul F. Pickel, Stephen J. McErlain, and II Carlton J. Melone. The patent was filed on September 14, 2015, and issued on May 30, 2017.
The abstract of US9667751 describes a system and method for accelerating the transmission of broadcast data, such as financial data and news feeds, over a communication channel. This acceleration is achieved through data compression and decompression, which provides secure transmission, effectively increases communication bandwidth, and reduces latency. The patent also notes that encoders associated with particular fields within…

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 9667751 Patent:

US Patent 9667751, titled "Data feed acceleration," was granted on May 30, 2017, from an application filed on September 14, 2015. The patent generally describes systems and methods for accelerating data transmission, particularly for broadcast data like financial information and news feeds, by using real-time data compression and decompression to increase effective bandwidth and reduce latency. [cite: The entire patent document, specifically the "Publication

date", "Filing date" and "Abstract" fields.]
The patent explicitly incorporates several other patents and patent applications by reference. These directly related documents are the most relevant prior art for US9667751.
Here's an analysis of the most relevant prior art cited within US9667751:
1. U.S. Pat. No. 6,195,024
• Full Citation: U.S. Pat. No. 6,195,024, issued on Feb. 27, 2001. [cite: The entire patent document, specifically the "CROSS REFERENCE TO RELATED APPLICATIONS" and "DETAILED DESCRIPTION OF PREFERRED EMBODIMENTS" sections.]
• Publication/Filing Date: Issued Feb. 27, 2001. The filing date is Oct. 3, 2000, for…

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:

Under 35 U.S.C. § 103, a patent claim is considered obvious if the differences between the claimed invention and the prior art are such that the claimed invention as a whole would have been obvious to a person having ordinary skill in the art (PHOSITA) before the effective filing date of the claimed invention. The earliest priority date for US patent 9667751 is October 3, 2000, derived from U.S. Provisional Patent Application No. 60/237,571.
The "Prior Art" for this analysis will be drawn from the documents explicitly referenced and incorporated by reference within the US9667751 patent text that predate this priority date. These references provide a basis for determining what was known or obvious to a PHOSITA at the time of the invention.
Identified Prior Art References:
From the "CROSS REFERENCE TO RELATED APPLICATIONS" and "DETAILED DESCRIPTION OF PREFERRED EMBODIMENTS" sections of US9667751, the following commonly owned patents and patent applications are incorporated by reference and have filing dates prior to October 3, 2000:
1. US Pat. No. 6,195,024 ("Content Independent…

4. Litigation History of the Patent

Public records reflect that the 9667751 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

• Realtime Data LLC v. Array Networks Inc. et al. — 21-2251 · District of Delaware, U.S. Court of Appeals for the Federal Circuit (CAFC) · Dismissal affirmed on appeal
• Untitled case — 1:18-cv-01200 · U.S. District Court for the District of Delaware

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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