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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. 9769776 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9769776 (the "9769776 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**

A concise summary of US Patent 9,769,776, including its involvement in legal proceedings, is provided below.

Title: Apparatus and method for uplink synchronizing in multiple component carrier system

Assignee: Pantech Corp

Inventors: Ki Bum Kwon, Jae Hyun Ahn, Kang Suk HUH

Filing Date: October 31, 2016

Issue Date: September 19, 2017

Abstract:

A user equipment (UE) of re-organizing a timing advance group (TAG) is provided. The UE includes: a receiving unit for receiving, from a serving base station, secondary serving cell (SCell) configuration information which includes a first field and a second field, the first field including an ScellIndex of an SCell to indicate a removal of the...

## **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 9769776 Patent:

Analysis of Prior Art for U.S. Patent 9,769,776

Washington D.C. - A detailed analysis of the prior art cited against U.S. Patent No. 9,769,776, titled "Apparatus and method for uplink synchronizing in multiple component carrier system," has been conducted to assess potential anticipation of its claims under 35 U.S.C. § 102. The patent, granted on September 19, 2017, addresses the challenge of maintaining uplink synchronization in wireless communication systems that utilize multiple component carriers, a key technology in modern cellular networks.

The core of the invention lies in the management of Timing Advance Groups (TAGs), which group serving cells with similar uplink timing requirements. The patent details methods for a user equipment (UE) to reorganize these TAGs when a secondary serving cell (SCell) is added or removed, ensuring that the UE's transmissions on different carriers arrive at the base station (eNB) in a synchronized manner.

The following is a breakdown of the most relevant prior art cited during the patent's examination and their potential impact on the...

### **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 US Patent 9,769,776

Introduction

This analysis examines the obviousness of US Patent 9,769,776, titled "Apparatus and method for uplink synchronizing in a multiple component carrier system," under 35 U.S.C. § 103. The analysis is based on a review of the patent's claims and the prior art cited during its prosecution. A person having ordinary skill in the art (a "POSA") at the time of the invention would have been a wireless communication engineer with experience in 3GPP LTE standards, particularly in the areas of radio resource control (RRC), medium access control (MAC), and physical layer procedures related to carrier aggregation and uplink synchronization.

Summary of the Invention

US Patent 9,769,776 describes a method and apparatus for managing Timing Advance Groups (TAGs) in a wireless communication system that uses multiple component carriers (i.e., carrier aggregation). A TAG is a group of serving cells that share the same timing advance value, which is crucial for maintaining uplink synchronization. The invention focuses on the process of...

### **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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