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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. 9800633 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9800633 (the "9800633 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 US Patent 9,800,633 reveals the following details:

Title: Just-in-time distributed video cache

Assignee: The current assignee of record is Tir Technologies Ltd, based on an assignment recorded on May 4, 2025. The original assignee was Performance And Privacy Ireland Ltd.

Inventors: Erik R. Swenson, Jaime Heilpern, Sandeep Pombra, Ron Earley, Vadim Arshanskiy.

Filing Date: September 4, 2015

Issue Date: October 24, 2017

Abstract: The patent describes a system where a video optimizer, upon receiving a request to optimize and stream a source file, uses a unique key to query a cache database. This key identifies both the original source file and the specific optimization...

2. 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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