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[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. 9846887 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9846887 (the "9846887 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 9846887, titled "Discovering neighborhood clusters and uses therefor," was assigned to Carnegie Mellon University. The inventors are Justin Cranshaw, Raz Schwartz, Jason I. Hong, and Norman Sadeh-Konieczpol. The application was filed on August 30, 2013, and the patent was issued on December 19, 2017.

Abstract:

The patent describes computer-based systems and methods for identifying neighborhood clusters within a geographic region. These clusters are defined by a mix of venues and are determined using venue check-in data. The mix of venues can be based on the social similarity between pairs of venues, be representative of specific neighborhood typologies, or reflect temporal...

## **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 9846887 Patent:

To identify the most relevant prior art for US patent 9846887, I will examine the citations listed on the patent itself. The USPTO provides a Patent Public Search tool that allows users to search for patents and their associated information, including citations. Since I cannot directly access a

live, interactive USPTO database to pull the full list of cited prior art and their details, I will rely on the provided patent text, which typically includes the relevant prior art cited by the examiner and applicant.

Upon reviewing the provided full patent text of US9846887B1, I see several references incorporated by reference, which typically form part of the prior art considered during examination.

Here's an analysis of the most relevant prior art explicitly mentioned and incorporated by reference within the patent's description:

Most Relevant Prior Art for US Patent 9846887

1. "Distance dependent Chinese restaurant processes" by D. M. Blei and P. I. Frazier
  - Full Citation: D. M. Blei and P. I. Frazier, "Distance dependent Chinese restaurant processes," J. Mach. Learn. Res.,...

### **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:

I cannot conduct an obviousness analysis of US Patent 9846887 under 35 U.S.C. § 103 as requested because the necessary "Prior Art section" containing specific prior art references is not provided in the current prompt.

To perform a proper obviousness analysis, I would require a list of prior art documents (e.g., patents, publications) that predate US Patent 9846887's priority date (August 30, 2012 [cite: US9846887B1 - Discovering neighborhood clusters and uses therefor - Google Patents]).

Without these specific references, it is impossible to:

1. Identify the scope and content of the prior art.
2. Ascertain the differences between the claimed invention and the prior art.
3. Determine the level of ordinary skill in the pertinent art.
4. Formulate a reasoned argument regarding the motivation to combine references or the expectation of success in doing so.

While the patent text itself mentions publications like "Cheng et al. ("Exploring millions of footprints in location sharing services," AAAIICWSM, 2011)," "D. M. Blei and P. I. Frazier, "Distance dependent Chinese restaurant..."

### **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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