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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. 9900569 — Response to Assertion of Infringement

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. 9900569 (the "9900569 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

Patent Summary: US 9,900,569

A concise summary of US Patent 9,900,569, including details of ongoing litigation.

Title: Projection-type image display device

Assignee: Maxell, Ltd.

Inventors: Eriko Nagata, Shinji Onodera, Satomi Morishita, Naoya Oka, Masaaki Iwanaga

Filing Date: July 4, 2014

Issue Date: February 20, 2018

Abstract:

This projection-type image display device is provided with: a lamp drive unit that drives a lamp; a lamp voltage detection unit that detects a lamp interelectrode voltage (hereinafter referred to as a lamp voltage); an image correction unit that corrects image qualities of image signals to be supplied to an image display element; and a control unit that...

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 9900569 Patent:

As a senior technical patent analyst, I have identified and analyzed the prior art references cited

during the prosecution of US patent 9,900,569. The analysis focuses on the potential for these references to anticipate the independent claim (Claim 1) under 35 U.S.C. § 102.

Claim 1 of US patent 9,900,569 describes a projector that compensates for age-related lamp dimming by using a control unit that adjusts the image signal based on two specific inputs: the detected lamp voltage and the accumulated lamp usage period. The novelty of the claim rests on the combination of these specific inputs to control the image correction process, thereby avoiding the need for a separate optical sensor to measure brightness directly.

Below are the most relevant prior art references considered by the USPTO examiner and an analysis of their relevance to Claim 1.

Analysis of Cited Prior Art

The following references were cited by the examiner during the patent's prosecution.

1. Japanese Patent Application Laid-Open No. 2004-39563 (JP2004-39563A)

• Full Citation: JP2004-39563A, "Discharge Lamp...

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:

Based on your request, I will now provide the analysis of the obviousness of US patent 9,900,569.

Editor's Note: The user-provided content for this analysis contains two contradictory statements regarding the litigation status of US patent 9,900,569. The first summary indicates ongoing litigation as of May 2026, while the second, dated April 26, 2026, states there is no known litigation. This contradiction is noted. The following technical analysis proceeds as requested and does not rely on the patent's litigation status.

Analysis of Obviousness under 35 U.S.C. § 103

Under United States patent law, an invention is considered obvious "if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art" (35 U.S.C. § 103). This analysis assesses whether the independent claims of US patent 9,900,569 would have been obvious in light of prior art available before July 4, 2014.

The analysis focuses on the combination...

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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