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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. US10430725B2 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. US10430725B2 (the "US10430725B2 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 U.S. Patent US10430725B2 reveals a system for optimizing oil and gas production using machine learning. As of April 26, 2026, there is no indication of any litigation involving this patent in the 2026 dockets of the U.S. Court of Appeals for the Federal Circuit (CAFC).

Summary of U.S. Patent US10430725B2

Title: Petroleum analytics learning machine system with machine learning analytics applications for upstream and midstream oil and gas industry

Assignee: The original assignee was AKW Analytics Inc. However, records indicate a reassignment on March 27, 2020, to the inventors: Kressner, Arthur; Wu, Leon L.; Anderson, Roger N.; and Xie, Boyi.

Inventors:

- Roger N. Anderson...

## **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 US10430725B2 Patent:

As a senior US patent analyst, I have examined the prior art cited during the prosecution of US

patent US10430725B2. The following analysis details the most relevant references and their potential impact on the patent's claims, particularly independent claim 1, under 35 U.S.C. § 102 (anticipation).

A reference anticipates a claim if it discloses, either expressly or inherently, each and every element of the claim. My analysis focuses on whether any single cited reference meets this high bar for independent claim 1.

#### Analysis of Cited Prior Art

The following patents and patent applications were cited by the USPTO examiner during the prosecution of the application for US10430725B2.

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#### 1. US Patent Application Publication No. US20140278144A1

- Full Citation: US20140278144A1, "Analytics for petroleum industry". Filed by Garduno et al. on March 14, 2013, and published on September 18, 2014. Assignee: SCHLUMBERGER TECHNOLOGY CORPORATION.
- Brief Description: This application describes a comprehensive analytics platform for the petroleum industry. It discloses a system that...

### 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:

As a senior patent analyst, my analysis of obviousness under 35 U.S.C. § 103 considers what a Person Having Ordinary Skill in the Art (PHOSITA) would have found obvious at the time of the invention. This involves determining whether there was a motivation to combine existing prior art references with a reasonable expectation of success. For US patent US10430725B2, a PHOSITA would be a petroleum engineer or data scientist with experience in oil and gas operations and the application of data analytics and machine learning to that field.

Based on the cited prior art, a strong case for the obviousness of independent claim 1 can be made by combining the teachings of multiple references.

#### Obviousness Analysis of Independent Claim 1

Primary Combination: US20140278144A1 (hereafter 'Garduno') in view of US20150242751A1 (hereafter 'Li').

A PHOSITA would have been motivated to combine the broad, lifecycle-spanning analytics platform of Garduno with the specific machine learning techniques disclosed by Li to achieve a more powerful and automated optimization system. The combination of these...

### 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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