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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. US7430471 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. US7430471 (the "US7430471 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 comprehensive summary of United States Patent US7430471 is provided below, based on a thorough analysis of the patent documentation and a search of public records as of April 26, 2026.

Summary of U.S. Patent No. 7,430,471

Title: Method and system for monitoring a vehicle

Inventor: Franklin C. Simon

Original Assignee: Payment Protection Systems Inc.

Filing Date: October 25, 2005

Issue Date: September 30, 2008

Current Assignee: As of a 2023 court filing, the patent was asserted by RFC Lenders of Texas, LLC. A search of the USPTO's assignment database did not reveal any subsequent reassignments. Therefore, RFC Lenders of Texas, LLC is the last known assignee.

Abstract: The patent...

## **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 US7430471 Patent:

As a senior US patent analyst, I have reviewed the citations listed in the patent file for US7430471. The following analysis details the most relevant prior art references and their potential impact on the patent's claims, specifically focusing on anticipation under 35 U.S.C. § 102 as of today's date, April 30, 2026.

Analysis of Most Relevant Prior Art for US7430471

For a claim to be anticipated, every element and limitation of that claim must be found in a single prior art reference. The following references, cited by the patent examiner during prosecution, are the most pertinent to the independent claims of US7430471.

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1. US5311197A - "Event-activated reporting of vehicle location"

• Full Citation:

Patent Number: US5311197A

Title: Event-activated reporting of vehicle location

Publication Date: May 10, 1994

Filing Date: February 1, 1993

Inventor: S. Sorden, et al.

Assignee: Trimble Navigation Limited

• Brief Description:

This patent describes a system for tracking a vehicle's location. The system remains dormant until a specific event occurs, such as the vehicle's...

### **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 my analysis of the patent and the provided prior art, here is an assessment of the obviousness of US Patent US7430471 under 35 U.S.C. § 103 as of today's date, April 30, 2026.  
Obviousness Analysis under 35 U.S.C. § 103

For a claim to be found obvious, the differences between the claimed invention and the prior art must be 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 (PHOSITA). This analysis often involves combining multiple prior art references, but there must be a clear reason or "motivation to combine" those references.

The independent claims of US7430471 would likely be rendered obvious by a combination of the prior art references cited during prosecution, particularly US5311197A and US6225890B1.

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Obviousness of Independent Claim 1

Claim 1 Elements:

- (a) Detecting vehicle movement/activation.
- (b) Transmitting a signal of this to a control center.
- (c) Transmitting any received operator ID to the control center.
- (d) Determining if the operator ID was received...

### **4. Litigation History of the Patent**

Public records reflect that the US7430471 Patent has been the subject of the following litigation,

which informs our view of the asserted claims and your client's enforcement posture:

- RFC Lenders of Texas, LLC v. Samsara Inc. — 6:23-cv-00832 · Texas Western District Court · filed 2023-11-13 · Unknown
- RFC Lenders of Texas, LLC v. Geotab Inc. — 5:23-cv-00387 · Texas Western District Court · filed 2023-04-10 · Unknown
- RFC Lenders of Texas, LLC v. Omnitrac, LLC — 4:23-cv-00141 · Texas Eastern District Court · filed 2023-02-17 · Unknown
- RFC Lenders of Texas, LLC v. Motive Technologies, Inc. — 4:22-cv-00303 · Texas Eastern District Court · filed 2022-04-13 · Unknown
- RFC Lenders of Texas, LLC v. Verizon Connect Inc. — 4:22-cv-00266 · Texas Eastern District Court · filed 2022-03-30 · Unknown
- RFC Lenders of Texas, LLC v. Spireon, Inc. — 4:21-cv-00965 · Texas Eastern District Court · filed 2021-12-14 · Unknown
- RFC Lenders of Texas, LLC v. CalAmp Corp. — 4:21-cv-00686 · Texas Eastern District Court · filed 2021-09-07 · Unknown
- Orthosie Systems, LLC v. GPS Trackit — 4:20-cv-00629 · Texas Eastern District Court · filed 2020-08-19 · Unknown
- ...and 18 additional case(s)

## 5. 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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