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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. US8942252B2 — Response to Assertion of Infringement**

Dear Counsel,

We acknowledge receipt of your correspondence asserting infringement of U.S. Patent No. US8942252B2 (the "US8942252B2 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**

Summary of U.S. Patent US8942252B2

A concise summary of U.S. Patent US8942252B2 is provided below, based on a search of the USPTO database.

Title: Method and system synchronization of content rendering

Assignee: IMPLICIT LLC. Records also indicate a later assignment to Implicit Networks Inc.

Inventors: Edward Balassanian, Scott W. Bradley

Filing Date: March 25, 2013

Issue Date: January 27, 2015

Abstract: The patent describes a method and system for synchronizing the playback of content across multiple devices. In this system, one device is designated as the "master" and all others are "slaves." The master device sends messages containing its current playback time ("rendering time")...

## **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 US8942252B2 Patent:

Analysis of Prior Art for U.S. Patent No. 8,942,252

An analysis of the prior art cited during the examination of U.S. Patent No. 8,942,252 reveals several key documents that were considered by the USPTO patent examiner. This analysis details the most relevant of these references and their potential impact on the patentability of the claims under 35 U.S.C. § 102, which pertains to novelty and anticipation. The following references were cited by the examiner or the applicant and are listed in the patent's file wrapper. U.S. Patent No. 6,233,609 B1

- Full Citation: US Patent 6,233,609 B1, "Method and apparatus for providing temporal synchronization of data streams in a networked computer system," assigned to Intel Corporation.
- Publication/Filing Date: Published May 15, 2001; Filed June 30, 1998.
- Brief Description: This patent describes a system for synchronizing multiple data streams (e.g., audio and video) in a networked environment. It introduces the concept of a "master" clock and "slave" clocks. The master transmits its clock value to the slaves, which then adjust their own...

### **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:

Analysis of Obviousness for U.S. Patent No. 8,942,252 B2

#### **I. Introduction**

Under 35 U.S.C. § 103, a patent claim is considered obvious if the differences between the claimed invention 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 (PHOSITA). This analysis examines the claims of U.S. Patent No. 8,942,252 B2 in light of prior art available before its priority date of December 17, 2001.

The core of the '252 patent is a master/slave system for synchronizing multimedia playback across different rendering devices. The master device sends its "rendering time" (playback position) and "device time" (local clock time) to slave devices. The slave devices then calculate the time difference and adjust their playback to maintain synchronization. A key aspect highlighted in the claims is the "smoothing" of this time differential to avoid abrupt playback adjustments.

#### **II. Prior Art References**

A combination of prior art references teaches the fundamental concepts of the '252...

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

Public records reflect that the US8942252B2 Patent has been the subject of the following litigation, which informs our view of the asserted claims and your client's enforcement posture:

- Implicit, LLC v. Sonos, Inc. — 1:17-cv-00259-LPS · U.S. District Court for the District of Delaware · filed 2017-03-10 · Stayed / Moot
- Implicit, LLC v. D&M Holdings U.S. Inc. — 1:17-cv-00258-LPS · U.S. District Court for the District of Delaware · Impacted by IPR
- Sonos, Inc. v. Implicit, LLC — IPR2018-00767 · U.S. Patent and Trademark Office, Patent Trial and Appeal Board (PTAB) · filed 2017-10-16 · Final Written Decision / Claims Unpatentable

## 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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