

EXHIBIT F



July 21, 2022

VIA EMAIL

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Robert M. Isackson
PARTNER

Re: Response to April 9, 2022 Letter

Dear Lionel:

Thank you for your letter of April 9, 2022 to Matthew Kaufman ("Response Letter"). Please note that Mr. Kaufman is no longer with our firm and we ask that henceforth you communicate with me on this matter.

While we appreciate your position and your additional explanations, we remain unconvinced that Carbyne's Apex product ("Apex") infringes CentralSquare's U.S. Patent No. 9,301,117 (the '117 Patent") for at least the reasons previously discussed in our letter of February 22, 2022.

Nevertheless, we have also concluded that the '117 Patent is invalid in view of the prior art. As you undoubtedly are aware, during the prosecution of the '117 Patent, the Examiner determined that US Patent Application Publication No. 2010/0261492 to Salafia et al. ("Salafia") teaches all the features of original claim 1 and rejected that claim as anticipated by Salafia. Rather than dispute the Examiner's position, the Applicant instead incorporated the below features of dependent claim 7 into the independent claim to overcome the rejection:

a web-hosting module configured to host web resources configured to:
(i) query wireless mobile devices for location information; and (ii) share, responsive to receipt of location information, received location information with the presentation module;

wherein the first outgoing textual message includes a uniform resource locator (URL) link to the web resources; and

wherein the presentation module is further configured to present shared queried location information to emergency operators through the user interface.

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Not finding such elements in the art of record, the Examiner then allowed the claim as narrowed by that amendment. It appears that the Examiner was wrong in doing so, because the above features had in fact been previously disclosed in the prior art, namely in US Patent Application Publication No. 2012/0190384 to Marr et al. ("Marr").¹ Specifically, Marr discloses a method in which a web server of an emergency call center queries a mobile device of person needing roadside assistance via a text message for location information and shares the received location information with a presentation module. More specifically, the text message sent by the call center can include a URL that directs to the web server and enables the web server to receive the person's location information, and this location information can then be used by the call center, for example, shared with a service technician via a user interface.

Notably, Marr teaches that the person in need of assistance can initiate the emergency service call by a voice call or an application installed on the mobile phone, and the call center transmits a responsive text containing the URL, thus meeting the separate communication networks as we understand you are interpreting this claim language. *See, e.g.*, Marr, paragraphs [0037] – [0041]; Figs. 4-5. In view of these teachings of Marr, a prior art in the same field of endeavour as the '117 Patent and which teaches a solution to the particular problem of identifying the location of a caller, we believe that Marr fills the deficiencies of Salafia as it relates to claim 1 of the '117 Patent. Accordingly, it would have been obvious to a person of ordinary skill in the art who would have been highly motivated to combine the teachings of Salafia and Marr and, with a reasonable expectation of success, would have arrived at the system of claim 1 of the '117 Patent prior to the effective filing date of the '117 Patent, making the '117 Patent invalid under 35 U.S.C. § 103.

Based on both its non-infringement and invalidity positions, Carbyne respectfully elects to not engage CentralSquare in license negotiations at this time, but otherwise continues to reserve all rights.

¹ US Patent Application Publication No. 2012/0190384 to Marr et al. is attached as Exhibit A.

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Sincerely,

A handwritten signature in blue ink, appearing to read "Robert M. Isackson", is centered on the page. The signature is fluid and cursive, with a prominent initial "R" and "I".

Robert M. Isackson