

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORP.,
Petitioner,

v.

AUTOCONNECT HOLDINGS, LLC,
Patent Owner.

Case No. IPR2025-00891
U.S. Patent No. 9,147,296

PETITIONER'S STIPULATION

Pursuant to the Interim Processes for PTAB Workload Management, issued March 26, 2025,¹ the FAQs for Interim Processes for PTAB Workload Management,² and the Board’s guidance in the “Learn about the new interim processes relating to institution in AIA proceedings” presentation,³ Petitioner, Toyota Motor Corp., stipulates as follows:

If the Patent Trial and Appeal Board (PTAB) institutes this *inter partes* review, Petitioner will not pursue against the ’296 Patent in *AutoConnect Holdings LLC v. Toyota Motor Corp. et al.*, No. 2:24-cv-00802 (E.D. Tex.) “the specific grounds [asserted in IPR2025-00891], or ... any other ground ... that was raised or could have been reasonably raised in an IPR (i.e., any ground that could be raised under §§ 102 or 103 on the basis of prior art patent or printed publications)” (*see Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13-14 (PTAB

¹ Available at

<https://www.uspto.gov/sites/default/files/documents/InterimProcesses-PTABWorkloadMgmt-20250326.pdf>.

² Available at <https://www.uspto.gov/patents/ptab/faqs/interim-processes-workload-management> (FAQ 14).

³ Presentation, video, and FAQs available at <https://www.uspto.gov/about-us/events/learn-about-new-interim-processes-relating-institution-aia-proceedings>.

Dec. 1, 2020) (precedential as to § II.A)).

Respectfully submitted,

Dated: June 27, 2025

By: /Joshua L. Goldberg/
Joshua L. Goldberg, Reg. No. 59,369

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing **Petitioner's Stipulation** was served on June 27, 2025, on counsel of record for the Patent Owner at the following:

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Dated: June 27, 2025

/Daniel E. Doku/
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