IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AUTOCONNECT HOLDINGS LLC, Plaintiff, v. TOYOTA MOTOR CORPORATION, et al., Defendants.	§ § § § § § § §	Case No. 2:24-cv-00802-JRG-RSP (Lead Case)
AUTOCONNECT HOLDINGS LLC, Plaintiff, v. GENERAL MOTORS LLC, Defendant.	§ § § § § § § §	Case No. 2:24-cv-00877-JRG-RSP (Member Case)

AUTOCONNECT'S DISCLOSURE OF ASSERTED CLAIMS AND INFRINGEMENT CONTENTIONS AGAINST TOYOTA AND DOCUMENT PRODUCTION ACCOMPANYING DISCLOSURE

Pursuant to Patent Rules 3-1 and 3-2, Plaintiff AutoConnect Holdings LLC ("AutoConnect") hereby serves its Disclosure of Asserted Claims and Infringement Contentions against Defendant Toyota Motor Core3poration, Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales, U.S.A., Inc. (collectively, "Toyota"), along with its Document Production Accompanying Disclosure.

This disclosure is based on publicly available information that describes or discusses relevant features of the Accused Instrumentalities. AutoConnect's investigation of relevant facts is ongoing, discovery has not yet begun, and the Court has not yet construed the claims. Further, important information about many or all of Toyota's Accused Instrumentalities is not publicly

available, including technical information relevant to the Asserted Patents and Accused Instrumentalities. Accordingly, AutoConnect reserves the right to amend and/or supplement these disclosures as information becomes available, such as based on new information learned through discovery, the Court's claim construction rulings, and/or positions taken by Toyota.

I. P.R. 3-1(A): IDENTIFICATION OF ASSERTED CLAIMS

AutoConnect asserts U.S. Patent No. 8,793,034 ("the '034 Patent"), U.S. Patent No. 9,020,491 ("the '491 Patent"), U.S. Patent No. 9,020,697 ("the '697 Patent"), U.S. Patent No. 9,116,786 ("the '786 Patent"), U.S. Patent No. 9,123,186 ("the '186 Patent"), U.S. Patent No. 9,140,560 ("the '560 Patent"), U.S. Patent No. 9,147,296 ("the '296 Patent"), U.S. Patent No. 9,290,153 ("the '153 Patent"), U.S. Patent No. 10,862,764 ("the '764 Patent"), U.S. Patent No. 11,163,931 ("the '931 Patent"), and U.S. Patent No. 12,039,243 ("the '243 Patent") (collectively, the "Asserted Patents") against Toyota. AutoConnect contends Toyota infringes the following Asserted Claims of the Asserted Patents based on its activities (as described herein) related to the Accused Instrumentalities:

Asserted Patents	Asserted Claims
'034 Patent	Claims 1, 7, 8, 9, 10, 11, 14, 15, 16, and 17 ("the '034 Asserted Claims")
'491 Patent	Claims 11, 12, 13, 14, 15, and 16 ("the '491 Asserted Claims")
'697 Patent	Claims 1, 3, 4, 5, 8, 11, 12, 15, 18, and 19 ("the '697 Asserted Claims")
'786 Patent	Claims 1, 2, 6, 7, 8, 9, 11, 23, 24, 27, and 28 ("the '786 Asserted Claims")
'186 Patent	Claims 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, and 20 ("the '186 Asserted Claims")
'560 Patent	Claims 11, 12, 13, 15, and 16 ("the '560 Asserted Claims")
'296 Patent	Claims 1, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, 17, 18, 19, and 20 ("the '296 Asserted Claims")

Asserted Patents	Asserted Claims
’153 Patent	Claims 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 14, 15, 18, 19, 20, and 21 (“the ’153 Asserted Claims”)
’764 Patent	Claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 19, and 20 (“the ’764 Asserted Claims”)
’931 Patent	Claims 1, 2, 3, 4, 5, 6, and 13 (“the ’931 Asserted Claims”)
’243 Patent	Claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, and 20 (“the ’243 Asserted Claims”)

II. P.R. 3-1(B): IDENTIFICATION OF ACCUSED INSTRUMENTALITIES

The Accused Instrumentalities include at least the following, as well as instrumentalities with reasonably similar functionality (collectively, the “Accused Instrumentalities”).

AutoConnect’s identification of the Accused Instrumentalities is based on information reasonably available at this time. AutoConnect reserves the right to amend and/or supplement its identification of the Accused Instrumentalities as new information becomes available through discovery, additional factual investigation, the Court’s claim construction rulings, or other relevant circumstances. Specifically, AutoConnect reserves the right to amend and/or supplement its identification of Accused Instrumentalities, as well as other information contained in this document and the Exhibits hereto, based on new information learned during discovery, including amending the Accused Instrumentalities to add newly released products or other equivalent or infringing products ascertained through discovery. Further, if any Accused Instrumentalities have gone through or will go through name changes but were or will be manufactured, used, offered for sale, sold, or imported with the same accused features or similar features, earlier or later corresponding products under different names are also accused. The identified Accused Instrumentalities include all trims and/or versions of the listed vehicles.

Asserted Claims	Accused Instrumentalities
’034 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable user profiles in vehicles, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit A1 (“the ’034 Accused Instrumentalities”).
’491 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle communication systems, in-vehicle multimedia systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Toyota vehicles, in the makes and models from the 2019 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit B1 (“the ’491 Accused Instrumentalities”).
’697 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Toyota’s Digital Key feature, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit C2 (“the ’697 Accused Instrumentalities”).
’786 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer-readable media that store computer-executable instructions and hardware and software that enable Device Profiles and Apple CarPlay and/or Android Auto in Toyota vehicles, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit D1 (“the ’786A Accused Instrumentalities”).

Asserted Claims	Accused Instrumentalities
	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Toyota's Digital Key feature, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit D2 ("the '786B Accused Instrumentalities").
'186 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Toyota's Digital Key feature, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit E1 ("the '186 Accused Instrumentalities").
'560 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle communication systems (including an in-vehicle multimedia system), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Toyota vehicles, in the makes and models from the 2019 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit F1 ("the '560 Accused Instrumentalities").
'296 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer-readable media that store computer-executable instructions and hardware and software that enable user profiles in Toyota vehicles, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit G1 ("the '296 Accused Instrumentalities").

Asserted Claims	Accused Instrumentalities
’153 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle communication systems (including an in-vehicle multimedia system), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable wireless Apple CarPlay and/or Android Auto in Toyota vehicles, in certain makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit H1 (“the ’153A Accused Instrumentalities”). All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Toyota’s Digital Key feature, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit H2 (“the ’153B Accused Instrumentalities”).
’764 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle communication systems (including in-vehicle multimedia systems), and hardware and software components thereof, including non-transitory computer readable media that store computer- executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Toyota vehicles, in the makes and models from the 2019 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit I1 (“the ’764 Accused Instrumentalities”).
’931 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), server systems, mobile applications (including the Toyota and Lexus Apps), computing devices that execute the Toyota and Lexus Apps, and hardware and software components thereof, including non-tangible computer-readable media that stores microprocessor-executable instructions and Toyota’s in-vehicle hardware and software components that enable Toyota’s Digital Key feature, in the makes and models from the 2022 model year to the present and any yet-to-

Asserted Claims	Accused Instrumentalities
	be-released vehicles with reasonably similar functionality, including those listed in Exhibit J1 ("the '931 Accused Instrumentalities").
'243 Asserted Claims	All Toyota vehicles (including the Toyota and Lexus brands of vehicles), vehicle systems (including in-vehicle multimedia systems), mobile applications (including the Toyota and Lexus Apps), and hardware and software components thereof, including non-transitory computer-readable media that store computer-executable instructions and hardware and software that enable user profiles in Toyota vehicles, in the makes and models from the 2022 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit K1 ("the '243 Accused Instrumentalities").

III. P.R. 3-1(C) AND (D): INFRINGEMENT

Attached as Exhibits A2-K2 are claim charts for the Asserted Patents that identify where each element of the Asserted Claims is found within the corresponding Accused Instrumentalities.

Toyota's source code and/or other non-public documentation will also confirm that Toyota's Accused Instrumentalities have met and currently meet the elements of each of the Asserted Claims of the Asserted Patents, as discussed in detail in Exhibits A2-K2. AutoConnect may supplement its Infringement Contentions under Paragraph 3(a)(i) of the Court's Discovery Order for these claim elements within 30 days after source code for all of the Accused Instrumentalities is made available for inspection by Toyota pursuant to the Court's Orders.

AutoConnect asserts that each element of the Asserted Claims is literally present in the corresponding Accused Instrumentalities. If any claim limitation is found not to be literally present, AutoConnect contends that such limitation is present under the doctrine of equivalents in each of the corresponding Accused Instrumentalities, as discussed in Exhibits A2-K2. By asserting that a claim element may be present under the doctrine of equivalents, AutoConnect

does not waive its right to assert literal infringement of that claim element. More information about infringement under the doctrine of equivalents may be found in the attached claim charts, Exhibits A2-K2.

AutoConnect's analysis of the Accused Instrumentalities is based on publicly available information and AutoConnect's investigation of such publicly available information. Toyota, however, provides limited or no publicly available information showing the design, functionality, or architecture of many or all aspects of the Accused Instrumentalities. AutoConnect therefore reserves the right to amend and/or supplement this disclosure for any allowable reason, including based on Toyota's production of non-public technical documentation concerning the Accused Instrumentalities.

Exhibit	Exhibit Description
A2	Exhibit A2 is a claim chart for the '034 Patent that identifies where each element of the '034 Asserted Claims is found within the '034 Accused Instrumentalities.
B2	Exhibit B2 is a claim chart for the '491 Patent that identifies where each element of the '491 Asserted Claims is found within the '491 Accused Instrumentalities.
C2	Exhibit C2 is a claim chart for the '697 Patent that identifies where each element of the '697 Asserted Claims is found within the '697 Accused Instrumentalities.
D3	Exhibit D2 is a claim chart for the '786 Patent that identifies where each element of the '786 Asserted Claims is found within the '786A Accused Instrumentalities.
D4	Exhibit D3 is a claim chart for the '786 Patent that identifies where each element of the '786 Asserted Claims is found within the '786B Accused Instrumentalities.
E2	Exhibit E2 is a claim chart for the '186 Patent that identifies where each element of the '186 Asserted Claims is found within the '186 Accused Instrumentalities.
F2	Exhibit F2 is a claim chart for the '560 Patent that identifies where each element of the '560 Asserted Claims is found within the '560 Accused Instrumentalities.
G2	Exhibit G2 is a claim chart for the '296 Patent that identifies where each element of the '296 Asserted Claims is found within the '296 Accused Instrumentalities.

Exhibit	Exhibit Description
H3	Exhibit H3 is a claim chart for the ’153 Patent that identifies where each element of the ’153 Asserted Claims is found within the ’153A Accused Instrumentalities.
H4	Exhibit H4 is a claim chart for the ’153 Patent that identifies where each element of the ’153 Asserted Claims is found within the ’153B Accused Instrumentalities.
I2	Exhibit I2 is a claim chart for the ’764 Patent that identifies where each element of the ’764 Asserted Claims is found within the ’764 Accused Instrumentalities.
J2	Exhibit J2 is a claim chart for the ’931 Patent that identifies where each element of the ’931 Asserted Claims is found within the ’931 Accused Instrumentalities.
K2	Exhibit K2 is a claim chart for the ’243 Patent that identifies where each element of the ’243 Asserted Claims is found within the ’243 Accused Instrumentalities.

A. ’034 Patent

1. ’034 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’034 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’034 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’034 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’034 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’034 Accused Instrumentalities to perform the asserted method claims of the ’034 patent.

2. ’034 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’034 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce,

third parties (including dealerships, customers, and other end-users), to make and/or use the ’034 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’034 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’034 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 9, 10, 11, 14, 15, 16, and 17 of the ’034 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’034 Accused Instrumentalities in ways that directly infringe the ’034 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’034 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’034 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’034 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’034 Accused Instrumentalities constitutes direct infringement of the ’034 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’034 patent since at least shortly after the issuance of the ’034 patent in July 2014, or was willfully blind to the existence of the patent. For example, in the 2016-2023 time frame, Toyota encountered patents related to the ’034 patent during prosecution of its own patents at least 60 times, and those

patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’034 patent.

Toyota has known that the making and/or using of their ’034 Accused Instrumentalities constitutes an act of direct infringement of the ’034 patent. Toyota obtained this knowledge at least since January 2016. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota’s ’034 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the ’034 patent or Toyota was otherwise willfully blind to that fact.

3. ’034 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’034 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 9, 10, and 11 of the ’034 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the ’034 Accused Instrumentalities (including vehicle software components associated with enabling user profiles in Toyota vehicles) to these third parties with full knowledge of the ’034 patent. These third parties have assembled the components to make and use the ’034 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials,

promotional materials and the like that instructed/instruct them how to assemble and use the components of the ’034 Accused Instrumentalities in ways that infringed/infringe the ’034 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’034 patent. Toyota supplied/supplies these components with knowledge of the ’034 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’034 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’034 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’034 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 9, 10, 11, 14, 15, 16, and 17 of the ’034 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’034 Accused Instrumentalities (including vehicle software components associated with enabling user profiles in Toyota vehicles) with full knowledge of the ’034 patent. These third parties have made or used the ’034 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’034 Accused Instrumentalities and use them in ways that would infringe the ’034 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’034 patent if such assembly and usage took place in the

United States. Additionally, Toyota's components are especially made and/or especially adapted for use in an infringing manner and Toyota's components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota's actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the '034 patent. At a minimum, Toyota's conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the '034 patent (or would have infringed if those acts occurred within the United States).

5. '034 Willful Infringement

Toyota's infringement of the '034 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the '034 patent and its infringement of the '034 patent as described herein and in AutoConnect's Complaint. On information and belief, since knowing of the '034 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the '034 patent. On information and belief, Toyota has made no attempt to design around the claims of the '034 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the '034 patent are either invalid or not infringed by the '034 Accused Instrumentalities and/or or its activities concerning the '034 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota's willful infringement.

B. ’491 Patent

1. ’491 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’491 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’491 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’491 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’491 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’491 Accused Instrumentalities to perform the asserted method claims of the ’491 patent.

2. ’491 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’491 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’491 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’491 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’491 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 11, 12, 13, 14, 15, and 16 of the ’491 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’491 Accused Instrumentalities in ways that directly

infringe the ’491 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’491 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’491 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’491 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’491 Accused Instrumentalities constitutes direct infringement of the ’491 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’491 patent since at least shortly after the issuance of the ’491 patent in April 2015, or was willfully blind to the existence of the patent. For example, in the 2016-2023 time frame, Toyota encountered patents related to the ’491 patent during prosecution of its own patents at least 60 times, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’491 patent.

Toyota has known that the making and/or using of their ’491 Accused Instrumentalities constitutes an act of direct infringement of the ’491 patent. Toyota obtained this knowledge at least since January 2016. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate

decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota's '491 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the '491 patent or Toyota was otherwise willfully blind to that fact.

3. '491 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the '491 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 11, 12, 13, 14, 15, and 16 of the '491 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the '491 Accused Instrumentalities (including vehicle software components associated with Apple CarPlay and/or Android Auto) to these third parties with full knowledge of the '491 patent. These third parties have assembled the components to make and use the '491 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the '491 Accused Instrumentalities in ways that infringed/infringe the '491 patent. Toyota's components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota's components constituted/constitute a material part of the inventions claimed in the '491 patent. Toyota supplied/supplies these components with knowledge of the '491 patent and knowledge that the components were especially made for use in an infringing manner.

4. '491 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the '491 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components

of the ’491 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 11, 12, 13, 14, 15, and 16 of the ’491 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’491 Accused Instrumentalities (including vehicle software components associated with Apple CarPlay and/or Android Auto) with full knowledge of the ’491 patent. These third parties have made or used the ’491 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’491 Accused Instrumentalities and use them in ways that would infringe the ’491 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’491 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’491 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly

infringed/infringe the ’491 patent (or would have infringed if those acts occurred within the United States).

5. ’491 Willful Infringement

Toyota’s infringement of the ’491 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’491 patent and its infringement of the ’491 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’491 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’491 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’491 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’491 patent are either invalid or not infringed by the ’491 Accused Instrumentalities and/or or its activities concerning the ’491 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

C. <u>’697 Patent</u>

1. ’697 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’697 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’697 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’697 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’697 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’697 Accused Instrumentalities to perform the asserted method claims of the ’697 patent.

2. '697 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the '697 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the '697 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the '697 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the '697 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 8, 11, 12, 15, 18, and 19 of the '697 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their '697 Accused Instrumentalities in ways that directly infringe the '697 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the '697 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota's '697 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the '697 patent. Alternatively, Toyota has acted with willful blindness to these factsToyota knows that there is a high probability that the use of Toyota's '697 Accused Instrumentalities constitutes direct infringement of the '697 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the '697 patent since at least shortly after the issuance of the '697 patent in April 2015, or was willfully blind to the

existence of the patent. For example, in the 2015-2023 time frame, Toyota encountered patents related to the ’697 patent during prosecution of its own patents at least 90 times, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’697 patent. Moreover, Toyota had knowledge of the ’697 patent when Toyota identified that patent to the USPTO during prosecution of their own patent applications, starting at least as early as April 2017. Between April 2017 and October 2020, Toyota cited the ’697 patent during prosecution of at least four Toyota patent applications.

Toyota has known that the making and/or using of their ’697 Accused Instrumentalities constitutes an act of direct infringement of the ’697 patent. Toyota obtained this knowledge at least since September 2015. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota’s ’697 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the ’697 patent or Toyota was otherwise willfully blind to that fact.

3. ’697 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’697 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 8, 11, and 12 of the ’697 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing

into the United States components of the ’697 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) to these third parties with full knowledge of the ’697 patent. These third parties have assembled the components to make and use the ’697 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the ’697 Accused Instrumentalities in ways that infringed/infringe the ’697 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’697 patent. Toyota supplied/supplies these components with knowledge of the ’697 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’697 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’697 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’697 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 8, 11, 12, 15, 18, and 19 of the ’697 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’697 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) with full knowledge of the ’697 patent. These third parties have made or used the ’697 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website

materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’697 Accused Instrumentalities and use them in ways that would infringe the ’697 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’697 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’697 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’697 patent (or would have infringed if those acts occurred within the United States).

5. ’697 Willful Infringement

Toyota’s infringement of the ’697 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’697 patent and its infringement of the ’697 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’697 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’697 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’697 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’697 patent are either invalid or not infringed by the ’697 Accused Instrumentalities and/or or its activities concerning the ’697

Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota's willful infringement.

D. <u>'786 Patent</u>

1. '786 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the '786 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the '786A Accused Instrumentalities and/or '786B Accused Instrumentalities (collectively, the '786 Accused Instrumentalities). Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the '786 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the '786 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the '786 Accused Instrumentalities to perform the asserted method claims of the '786 patent.

2. '786 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the '786 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the '786 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the '786 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the '786 Accused Instrumentalities, with knowledge that usage in accordance with

their instructions directly infringed/infringes claims 1, 2, 6, 7, 8, 9, 11, 23, 24, 27, and 28 of the ’786 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’786 Accused Instrumentalities in ways that directly infringe the ’786 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’786 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’786 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’786 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’786 Accused Instrumentalities constitutes direct infringement of the ’786 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’786 patent since at least shortly after the issuance of the ’786 patent in August 2015, or was willfully blind to the existence of the patent. For example, in the 2015-2023 time frame, Toyota encountered several patents related to the ’786 patent during prosecution of its own patents, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’786 patent.

Toyota has known that the making and/or using of their ’786 Accused Instrumentalities constitutes an act of direct infringement of the ’786 patent. Toyota obtained this knowledge at least since August 2015. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by

the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota's lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota's '786 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the '786 patent or Toyota was otherwise willfully blind to that fact.

3. '786 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the '786 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 1, 2, 6, 7, 8, 9, 11, 23, 24, 27, and 28 of the '786 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the '786 Accused Instrumentalities (including vehicle software components associated with Device Profiles and/or Apple CarPlay and/or Android Auto and/or Toyota Apps and/or Digital Key in Toyota's vehicles) to these third parties with full knowledge of the '786 patent. These third parties have assembled the components to make and use the '786 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the '786 Accused Instrumentalities in ways that infringed/infringe the '786 patent. Toyota's components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota's components constituted/constitute a material part of the inventions claimed in the '786 patent. Toyota supplied/supplies these

components with knowledge of the ’786 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’786 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’786 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’786 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 1, 2, 6, 7, 8, 9, 11, 23, 24, 27, and 28 of the ’786 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’786 Accused Instrumentalities (including vehicle software components associated with Device Profiles and/or Apple CarPlay and/or Android Auto and/or Toyota Apps and/or Digital Key in Toyota’s vehicles) with full knowledge of the ’786 patent. These third parties have made or used the ’786 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’786 Accused Instrumentalities and use them in ways that would infringe the ’786 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’786 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota's actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the '786 patent. At a minimum, Toyota's conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the '786 patent (or would have infringed if those acts occurred within the United States).

5. '786 Willful Infringement

Toyota's infringement of the '786 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the '786 patent and its infringement of the '786 patent as described herein and in AutoConnect's Complaint. On information and belief, since knowing of the '786 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the '786 patent. On information and belief, Toyota has made no attempt to design around the claims of the '786 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the '786 patent are either invalid or not infringed by the '786 Accused Instrumentalities and/or or its activities concerning the '786 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota's willful infringement.

E. <u>'186 Patent</u>

1. '186 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the '186 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the '186 Accused Instrumentalities. Toyota has

also directly infringed and continues to directly infringe Asserted Claims of the ’186 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’186 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’186 Accused Instrumentalities to perform the asserted method claims of the ’186 patent.

2. ’186 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’186 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’186 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’186 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’186 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, and 20 of the ’186 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’186 Accused Instrumentalities in ways that directly infringe the ’186 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’186 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’186 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’186 patent.

Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota's '186 Accused Instrumentalities constitutes direct infringement of the '186 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the '186 patent since at least shortly after the issuance of the '186 patent in September 2015, or was willfully blind to the existence of the patent. For example, in the 2015-2023 time frame, Toyota encountered patents related to the '186 patent during prosecution of its own patents at least 85 times, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the '186 patent. Moreover, Toyota had knowledge of the '186 patent when Toyota identified that patent to the USPTO during prosecution of their own patent applications, starting at least as early as January 2019. Between January 2019 and January 2023, Toyota cited the '186 patent during prosecution of at least two Toyota patent applications.

Toyota has known that the making and/or using of their '186 Accused Instrumentalities constitutes an act of direct infringement of the '186 patent. Toyota obtained this knowledge at least since September 2015. Moreover, Toyota has had such knowledge upon service of AutoConnect's December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota's lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota's '186 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the '186 patent or Toyota was otherwise willfully blind to that fact.

3. ’186 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’186 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 8, 9, 10, 11, 12, 13, and 14 of the ’186 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the ’186 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) to these third parties with full knowledge of the ’186 patent. These third parties have assembled the components to make and use the ’186 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the ’186 Accused Instrumentalities in ways that infringed/infringe the ’186 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’186 patent. Toyota supplied/supplies these components with knowledge of the ’186 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’186 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’186 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’186 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, and

20 of the ’186 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’186 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) with full knowledge of the ’186 patent. These third parties have made or used the ’186 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’186 Accused Instrumentalities and use them in ways that would infringe the ’186 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’186 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’186 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’186 patent (or would have infringed if those acts occurred within the United States).

5. ’186 Willful Infringement

Toyota’s infringement of the ’186 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’186 patent and its infringement of

the ’186 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’186 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’186 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’186 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’186 patent are either invalid or not infringed by the ’186 Accused Instrumentalities and/or or its activities concerning the ’186 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

F. ’560 Patent

1. ’560 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’560 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’560 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’560 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’560 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’560 Accused Instrumentalities to perform the asserted method claims of the ’560 patent.

2. ’560 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted of the ’560 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’560

Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’560 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’560 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 11, 12, 13, 15, and 16 of the ’560 patent, or with willful blindness to that factToyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’560 Accused Instrumentalities in ways that directly infringe the ’560 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’560 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’560 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’560 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’560 Accused Instrumentalities constitutes direct infringement of the ’560 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’560 patent since at least shortly after the issuance of the ’560 patent in September 2015, or was willfully blind to the existence of the patent. For example, in the 2016-2023 time frame, Toyota encountered patents related to the ’560 patent during prosecution of its own patents at least 60 times, and those patents share the same priority documents and specifications, had the same named inventor

(Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’560 patent.

Toyota has known that the making and/or using of their ’560 Accused Instrumentalities constitutes an act of direct infringement of the ’560 patent. Toyota obtained this knowledge at least since January 2016. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota’s ’560 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the ’560 patent or Toyota was otherwise willfully blind to that fact.

3. ’560 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’560 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of 11, 12, 13, and 15 of the ’560 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the ’560 Accused Instrumentalities (including vehicle software components associated with Apple CarPlay and/or Android Auto in Toyota’s vehicles) to these third parties with full knowledge of the ’560 patent. These third parties have assembled the components to make and use the ’560 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the

components of the ’560 Accused Instrumentalities in ways that infringed/infringe the ’560 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’560 patent. Toyota supplied/supplies these components with knowledge of the ’560 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’560 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’560 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’560 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe 11, 12, 13, 15, and 16 of the ’560 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’560 Accused Instrumentalities (including vehicle software components associated with Apple CarPlay and/or Android Auto in Toyota’s vehicles) with full knowledge of the ’560 patent. These third parties have made or used the ’560 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’560 Accused Instrumentalities and use them in ways that would infringe the ’560 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’560 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted

for use in an infringing manner and Toyota's components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota's actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the '560 patent. At a minimum, Toyota's conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the '560 patent (or would have infringed if those acts occurred within the United States).

5. '560 Willful Infringement

Toyota's infringement of the '560 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the '560 patent and its infringement of the '560 patent as described herein and in AutoConnect's Complaint. On information and belief, since knowing of the '560 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the '560 patent. On information and belief, Toyota has made no attempt to design around the claims of the '560 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the '560 patent are either invalid or not infringed by the '560 Accused Instrumentalities and/or or its activities concerning the '560 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota's willful infringement.

G. <u>'296 Patent</u>

1. '296 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the '296 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents,

because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’296 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’296 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’296 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’296 Accused Instrumentalities to perform the asserted method claims of the ’296 patent.

2. ’296 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’296 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’296 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’296 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’296 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 8, 9, 11, 12, 13, 14, 15, 17, 18, 19, and 20 of the ’296 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’296 Accused Instrumentalities in ways that directly infringe the ’296 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’296 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional

materials encouraging them to purchase and to use Toyota's '296 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the '296 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota's '296 Accused Instrumentalities constitutes direct infringement of the '296 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the '296 patent since at least shortly after the issuance of the '296 patent in September 2015, or was willfully blind to the existence of the patent. For example, in the 2015-2023 time frame, Toyota encountered patents related to the '296 patent during prosecution of its own patents at least 86 times, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the '296 patent. Moreover, Toyota had knowledge of the '296 patent at least since the USPTO Examiner identified the asserted '296 patent to Toyota during prosecution of Toyota's own patent application, starting as early as March 2021.

Toyota has known that the making and/or using of their '296 Accused Instrumentalities constitutes an act of direct infringement of the '296 patent. Toyota obtained this knowledge at least since September 2015. Moreover, Toyota has had such knowledge upon service of AutoConnect's December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota's lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making

and/or using of Toyota's '296 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the '296 patent or Toyota was otherwise willfully blind to that fact.

3. '296 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the '296 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 14, 15, 17, 18, 19, and 20 of the '296 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the '296 Accused Instrumentalities (including vehicle software components associated with Toyota's Digital Key Technology) to these third parties with full knowledge of the '296 patent. These third parties have assembled the components to make and use the '296 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the '296 Accused Instrumentalities in ways that infringed/infringe the '296 patent. Toyota's components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota's components constituted/constitute a material part of the inventions claimed in the '296 patent. Toyota supplied/supplies these components with knowledge of the '296 patent and knowledge that the components were especially made for use in an infringing manner.

4. '296 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the '296 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the '296 Accused Instrumentalities to third parties (including their foreign subsidiaries,

dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 8, 9, 11, 12, 13, 14, 15, 17, 18, 19, and 20 of the ’296 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’296 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) with full knowledge of the ’296 patent. These third parties have made or used the ’296 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’296 Accused Instrumentalities and use them in ways that would infringe the ’296 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’296 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’296 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’296 patent (or would have infringed if those acts occurred within the United States).

5. ’296 Willful Infringement

Toyota’s infringement of the ’296 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’296 patent and its infringement of the ’296 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’296 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’296 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’296 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’296 patent are either invalid or not infringed by the ’296 Accused Instrumentalities and/or or its activities concerning the ’296 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

H. ’153 Patent

1. ’153 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’153 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’153A Accused Instrumentalities and/or ’153B Accused Instrumentalities (collectively, the ’153 Accused Instrumentalities). Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’153 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’153 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’153 Accused Instrumentalities to perform the asserted method claims of the ’153 patent.

2. ’153 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’153 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’153 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’153 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’153 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 12, 14, 15, 18, 19, 20, and 21 of the ’153 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’153 Accused Instrumentalities in ways that directly infringe the ’153 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’153 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’153 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’153 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’153 Accused Instrumentalities constitutes direct infringement of the ’153 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’153 patent since at least shortly after the issuance of the ’153 patent in March 2016, or was willfully blind to the

existence of the patent. For example, in the 2016-2023 time frame, Toyota encountered patents related to the ’153 patent during prosecution of its own patents at least 82 times, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’153 patent.

Toyota has known that the making and/or using of their ’153 Accused Instrumentalities constitutes an act of direct infringement of the ’153 patent. Toyota obtained this knowledge at least since July 2016. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota’s ’153 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the ’153 patent or Toyota was otherwise willfully blind to that fact.

3. ’153 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’153 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 12, 14, 15, 18, 19, 20, and 21 of the ’153 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the ’153 Accused Instrumentalities (including vehicle software components associated with wireless Apple CarPlay and/or Android Auto and/or Digital Key in Toyota’s vehicles) to these third parties with full knowledge of the

’153 patent. These third parties have assembled the components to make and use the ’153 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the ’153 Accused Instrumentalities in ways that infringed/infringe the ’153 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’153 patent. Toyota supplied/supplies these components with knowledge of the ’153 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’153 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’153 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’153 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 12, 14, 15, 18, 19, 20, and 21 of the ’153 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’153 Accused Instrumentalities (including vehicle software components associated with wireless Apple CarPlay and/or Android Auto and/or Digital Key in Toyota’s vehicles) with full knowledge of the ’153 patent. These third parties have made or used the ’153 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’153 Accused Instrumentalities and use them in ways that would infringe the ’153 patent if such combination occurred within the

United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’153 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’153 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’153 patent (or would have infringed if those acts occurred within the United States).

5. ’153 Willful Infringement

Toyota’s infringement of the ’153 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’153 patent and its infringement of the ’153 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’153 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’153 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’153 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’153 patent are either invalid or not infringed by the ’491 Accused Instrumentalities and/or or its activities concerning the ’153 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

I. ’764 Patent

1. ’764 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’764 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’764 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’764 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’764 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’764 Accused Instrumentalities to perform the asserted method claims of the ’764 patent.

2. ’764 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’764 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’764 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’764 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’764 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 19, and 20 of the ’764 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’764 Accused

Instrumentalities in ways that directly infringe the ’764 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’764 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’764 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’764 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’764 Accused Instrumentalities constitutes direct infringement of the ’764 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’764 patent since at least shortly after the issuance of the ’764 patent in December 2020, or was willfully blind to the existence of the patent. For example, Toyota had knowledge of the ’764 patent at least since the USPTO Examiner identified the ’764 patent to Toyota during prosecution of Toyota’s own patent application in March 2021.

Toyota has known that the making and/or using of their ’764 Accused Instrumentalities constitutes an act of direct infringement of the’764 patent. Toyota obtained this knowledge at least since March 2021. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making

and/or using of Toyota's '764 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the '764 patent or Toyota was otherwise willfully blind to that fact.

3. '764 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the '764 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 19, and 20 of the '764 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the '764 Accused Instrumentalities (including vehicle software components associated with Apple CarPlay and/or Android Auto in Toyota's vehicles) to these third parties with full knowledge of the '764 patent. These third parties have assembled the components to make and use the '764 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the '764 Accused Instrumentalities in ways that infringed/infringe the '764 patent. Toyota's components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota's components constituted/constitute a material part of the inventions claimed in the '764 patent. Toyota supplied/supplies these components with knowledge of the '764 patent and knowledge that the components were especially made for use in an infringing manner.

4. '764 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the '764 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the '764 Accused Instrumentalities to third parties (including their foreign subsidiaries,

dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 19, and 20 of the ’764 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’764 Accused Instrumentalities (including vehicle software components associated with Apple CarPlay and/or Android Auto in Toyota’s vehicles) with full knowledge of the ’764 patent. These third parties have made or used the ’764 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’764 Accused Instrumentalities and use them in ways that would infringe the ’764 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’764 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’764 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’764 patent (or would have infringed if those acts occurred within the United States).

5. ’764 Willful Infringement

Toyota’s infringement of the ’764 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’764 patent and its infringement of the ’764 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’764 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’764 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’764 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’764 patent are either invalid or not infringed by the ’764 Accused Instrumentalities and/or or its activities concerning the ’764 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

J. ’931 Patent

1. ’931 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’931 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’931 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’931 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’931 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’931 Accused Instrumentalities to perform the asserted method claims of the ’931 patent.

2. '931 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the '931 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the '931 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the '931 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the '931 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 1, 2, 3, 4, 5, 6, and 13 of the '931 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their '931 Accused Instrumentalities in ways that directly infringe the '931 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the '931 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota's '931 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the '931 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota's '931 Accused Instrumentalities constitutes direct infringement of the '931 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the '931 patent since at least shortly after the issuance of the '931 patent in November 2021, or was willfully blind to the

existence of the patent. For example, in the 2021-2023 time frame, Toyota encountered patents related to the ’931 patent during prosecution of its own patents, and those patents share the same priority documents and specifications, had the same named inventor (Chris Ricci), and had the same initial assignees (Flextronics AP, LLC and AutoConnect Holdings LLC) as the ’931 patent. Moreover, Toyota had knowledge of the ’931 patent when Toyota identified that patent to the USPTO during prosecution of their own patent application in June 2022.

Toyota has known that the making and/or using of their ’931 Accused Instrumentalities constitutes an act of direct infringement of the ’931 patent. Toyota obtained this knowledge at least since November 2021. Moreover, Toyota has had such knowledge upon service of AutoConnect’s December 2023 letter provided Toyota with such knowledge, as demonstrated by the claim charts attached to the letter, and upon the filing and service of this Complaint as demonstrated by the claim charts attached hereto. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota’s ’931 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the ’931 patent or Toyota was otherwise willfully blind to that fact.

3. ’931 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’931 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 1, 2, 3, 4, 5, 6, and 13 of the ’931 patent. For example, Toyota has sold, offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the ’931 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) to these third

parties with full knowledge of the ’931 patent. These third parties have assembled the components to make and use the ’931 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the ’931 Accused Instrumentalities in ways that infringed/infringe the ’931 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’931 patent. Toyota supplied/supplies these components with knowledge of the ’931 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’931 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’931 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’931 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 1, 2, 3, 4, 5, 6, and 13 of the ’931 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’931 Accused Instrumentalities (including vehicle software components associated with Toyota’s Digital Key Technology) with full knowledge of the ’931 patent. These third parties have made or used the ’931 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’931 Accused Instrumentalities and use them in ways that would infringe the

’931 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’931 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’931 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’931 patent (or would have infringed if those acts occurred within the United States).

5. ’931 Willful Infringement

Toyota’s infringement of the ’931 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’931 patent and its infringement of the ’931 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’931 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’931 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’931 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’931 patent are either invalid or not infringed by the ’931 Accused Instrumentalities and/or or its activities concerning the ’931 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

K. ’243 Patent

1. ’243 Direct Infringement - 35 U.S.C. § 271(a)

Toyota has directly infringed and continues to directly infringe the Asserted Claims of the ’243 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because they have made, used, sold, offered for sale, and/or imported and are currently making, using, selling, offering for sale, and/or importing the ’243 Accused Instrumentalities. Toyota has also directly infringed and continues to directly infringe the Asserted Claims of the ’243 patent under 35 U.S.C. § 271(a), either literally or under the doctrine of equivalents, because Toyota operates and controls the ’243 Accused Instrumentalities by virtue of, for example, designing, programing, building, maintaining, and updating the ’243 Accused Instrumentalities to perform the asserted method claims of the ’243 patent.

2. ’243 Indirect Infringement - 35 U.S.C. § 271(b)

Toyota has indirectly infringed and continues to indirectly infringe the Asserted Claims of the ’243 patent under 35 U.S.C. § 271(b) because they have induced, and continue to induce, third parties (including dealerships, customers, and other end-users), to make and/or use the ’243 Accused Instrumentalities. Such making and/or using by third parties constitutes direct infringement of the Asserted Claims of the ’243 patent.

For example, Toyota has supplied, and continues to supply, such induced third parties with vehicles, instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to use the ’243 Accused Instrumentalities, with knowledge that usage in accordance with their instructions directly infringed/infringes claims 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of the ’243 patent, or with willful blindness to that fact. Toyota will continue to encourage, aid, or otherwise cause these third parties to, for example, use their ’243 Accused Instrumentalities in

ways that directly infringe the ’243 patent, and Toyota has and will continue to encourage these acts with the specific intent to infringe the ’243 patent. Further, Toyota provides information and technical support to their dealerships, customers, and other end-users, including manuals, brochures, documentation, tutorials, videos, demonstrations, website materials, and promotional materials encouraging them to purchase and to use Toyota’s ’243 Accused Instrumentalities with knowledge that such use constitutes an act of direct infringement of the ’243 patent. Alternatively, Toyota has acted with willful blindness to these facts. Toyota knows that there is a high probability that the use of Toyota’s ’243 Accused Instrumentalities constitutes direct infringement of the ’243 patent but took deliberate actions to avoid learning of these facts.

Toyota has been aware of the inventions described and claimed in the ’243 patent since at least shortly after the issuance of the ’243 patent in July 2024, or was willfully blind to the existence of the patent.

Toyota has known that the making and/or using of their ’243 Accused Instrumentalities constitutes an act of direct infringement of the ’243 patent. Toyota obtained this knowledge at least since July 2024. To the extent Toyota did not have actual knowledge of its infringement, Toyota’s lack of actual knowledge is due to their deliberate decision to avoid learning of these facts. Toyota, therefore, had knowledge that the making and/or using of Toyota’s ’243 Accused Instrumentalities by their dealerships, customers and/or other end users infringes the ’243 patent or Toyota was otherwise willfully blind to that fact.

3. ’243 Indirect Infringement - 35 U.S.C. § 271(c)

Toyota has indirectly infringed and continues to indirectly infringe the ’243 patent under 35 U.S.C. § 271(c) because they have contributed to direct infringement, and continue to contribute to direct infringement, by third parties (including dealerships, customer and end users), of claims 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of the ’243 patent. For example, Toyota has sold,

offered for sale, and/or imported into the United States and is currently selling, offering for sale, and/or importing into the United States components of the ’243 Accused Instrumentalities (including vehicle software components associated with enabling user profiles in Toyota vehicles) to these third parties with full knowledge of the ’243 patent. These third parties have assembled the components to make and use the ’243 Accused Instrumentalities according to instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to assemble and use the components of the ’243 Accused Instrumentalities in ways that infringed/infringe the ’243 patent. Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses. Further, Toyota’s components constituted/constitute a material part of the inventions claimed in the ’243 patent. Toyota supplied/supplies these components with knowledge of the ’243 patent and knowledge that the components were especially made for use in an infringing manner.

4. ’243 Indirect Infringement - 35 U.S.C. § 271(f)(2)

Toyota has also indirectly infringed and continues to indirectly infringe the ’243 patent under 35 U.S.C. § 271(f)(2) by supplying in or from the United States, one or more components of the ’243 Accused Instrumentalities to third parties (including their foreign subsidiaries, dealerships, customers, and other end users), and intending these third parties combine the components in a manner that would directly infringe claims 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10 of the ’243 patent if such combination occurred within the United States. For example, Toyota has supplied, and continues to supply, such third parties outside of the United States with one or more components of the ’243 Accused Instrumentalities (including vehicle software components associated with enabling user profiles in Toyota vehicles) with full knowledge of the ’243 patent. These third parties have made or used the ’243 Accused Instrumentalities according to

instructions, manuals, brochures, documentation, tutorials, videos, mobile applications, website materials, promotional materials and the like that instructed/instruct them how to combine the components of the ’243 Accused Instrumentalities and use them in ways that would infringe the ’243 patent if such combination occurred within the United States. Toyota provides these instructions to the third parties with the knowledge that assembly and usage in accordance with their instructions would infringe the ’243 patent if such assembly and usage took place in the United States. Additionally, Toyota’s components are especially made and/or especially adapted for use in an infringing manner and Toyota’s components were and are not staple articles or commodities of commerce suitable for substantial noninfringing uses.

Toyota’s actions demonstrate an intent not only to have caused the acts described herein that form the basis of direct infringement by third parties (or would form the basis of direct infringement if they occurred within the United States), but also that they caused these acts with the specific intent to infringe the ’243 patent. At a minimum, Toyota’s conduct demonstrates that Toyota either knew or should have known that the acts of such third parties directly infringed/infringe the ’243 patent (or would have infringed if those acts occurred within the United States).

5. ’243 Willful Infringement

Toyota’s infringement of the ’243 patent has been and continues to be willful and merits enhanced damages. For example, Toyota has known of the ’243 patent and its infringement of the ’243 patent as described herein and in AutoConnect’s Complaint. On information and belief, since knowing of the ’243 patent and its infringement thereof, Toyota has not taken any affirmative steps to avoid infringing the ’243 patent. On information and belief, Toyota has made no attempt to design around the claims of the ’243 patent. On information and belief, Toyota has no reasonable basis for believing that the claims of the ’243 patent are either invalid

or not infringed by the ’243 Accused Instrumentalities and/or or its activities concerning the ’243 Accused Instrumentalities. AutoConnect has been damaged as the result of Toyota’s willful infringement.

IV. P.R. 3-1(E): PRIORITY DATES

AutoConnect contends that the Asserted Claims are entitled to the following priority dates:

Asserted Claims	Priority Date
’034 Asserted Claims	11/16/2011
’491 Asserted Claims	11/16/2011
’697 Asserted Claims	04/15/2013
’786 Asserted Claims	11/16/2011
’186 Asserted Claims	04/15/2013
’560 Asserted Claims	11/16/2011
’296 Asserted Claims	04/15/2013
’153 Asserted Claims	04/15/2013
’764 Asserted Claims	11/16/2011
’931 Asserted Claims	04/15/2013
’243 Asserted Claims	04/15/2013

The above-listed priority dates are based on information reasonably available to AutoConnect at this time. AutoConnect reserves the right to supplement these priority dates based on information developed during this litigation, through discovery, or additional factual investigation. Specifically, discovery may reveal evidence that the inventions claimed in the Asserted Patents were conceived before the above-listed priority dates. In such instances, AutoConnect reserves the right to supplement these contentions.

V. P.R. 3-1(F): PRACTICING PRODUCTS

AutoConnect does not presently assert that its own apparatus, product, device, process, method, act, or other instrumentality practices the Asserted Claims of the Asserted Patents.

VI. P.R. 3-2(A): PRE-FILING SALES OR OFFERS TO SELL

Based on its reasonable search and investigation, AutoConnect states that it does not have any documents that fall within this category.

VII. P.R. 3-2(B): CONCEPTION, REDUCTION TO PRACTICE, DESIGN, AND DEVELOPMENT

Based on its reasonable search and investigation, AutoConnect states that it does not have any documents that fall within this category.

VIII. P.R. 3-2(C): PATENTS AND FILE HISTORIES

Copies of the AutoConnect patents and file histories are being produced concurrently with this disclosure at Bates Nos. AC00000001-AC00056394.

Dated: January 21, 2025

By: */s/William R. Woodford*

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CERTIFICATE OF SERVICE

This is to certify that on January 21, 2025, a true and correct copy of AutoConnect's Disclosure of Asserted Claims and Infringement Contention against Toyota and Document Production Accompanying Disclosure, along with its supporting exhibits, were served via email on counsel of record for Defendants Toyota Motor Corporation, et al.

/s/ Sallee Counce
Sallee Counce, Paralegal