From:	Director_PTABDecision_Review
To:	Eric Zelepugas; John S. LeRoy; Christopher C. Smith; FPGP0147IPR@brookskushman.com; FPGP0156IPR; AutoConnect (Post-Grant); Andrew B. Turner
Subject:	RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Request denied
Date:	Monday, February 9, 2026 10:35:00 AM

Counsel,

Patent Owner's request for authorization to submit new evidence in support of its requests for Director Review (IPR2025-01342, Paper 13; IPR2025-01383, Paper 14) is denied.

Thanks.

IPR2025-01342
Ex. 3102

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Friday, January 30, 2026 10:24 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Andrew B. Turner <aturner@brookskushman.com>; John S. LeRoy <jleroy@brookskushman.com>; Christopher C. Smith <csmith@brookskushman.com>; FPGP0147IPR@brookskushman.com; FPGP0156IPR <FPGP0156IPR@brookskushman.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>
Subject: Re: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Requests for submission of new evidence/arguments and extension of time for requests for Director Review

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Director,

Patent Owner's requests for an extension of time to file its Request for Director Review to permit analysis of the written decision that is forthcoming in the related IPR2026-00002 and to offer additional evidence remain pending. The Director's Decision Denying Patent Owner's Requests for Discretionary Denial instructed the parties not to file a request for Director Review "until a Notice of Decisions on Institution including this case issues." IPR2025-01342, Paper 10 at 4; IPR2025-01383, Paper 11 at 4. As the Notice of Decisions on Institution issued on January 16, 2026, today is the deadline for Patent Owner to file its request for Director Review under 37 C.F.R. §§ 42.71(d)(1) and 42.75(c). Accordingly, Patent Owner is filing its Requests for Director Review to ensure compliance with the deadline. Should the Director grant authorization of Patent Owner's request after this filing, Patent Owner will seek expungement of its filing, and submit replacement Director Review Requests in accordance with that authorization.

Best regards,

Eric A. Zelepugas

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From: Andrew B. Turner <aturner@brookskushman.com>
Sent: Thursday, January 29, 2026 3:21 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Eric Zelepugas <zelepugas@avantechlaw.com>
Cc: John S. LeRoy <jleroy@brookskushman.com>; Christopher C. Smith <csmith@brookskushman.com>; FPGP0147IPR@brookskushman.com <FPGP0147IPR@brookskushman.com>; FPGP0156IPR <FPGP0156IPR@brookskushman.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>
Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Requests for submission of new evidence/arguments and extension of time for requests for Director Review

Director,

Petitioner opposes Patent Owner's Request for Director Review of the discretionary decisions referring the petitions in IPR2025-01342 (Paper 9) and IPR2025-01383 (Paper 10). The Request is untimely and fails to establish good cause.

Patent Owner's request is untimely. Under 37 C.F.R. §§ 42.71(d)(1) and 42.75(c), a request for Director Review must be filed within 14 days of entry of a non-final decision. The referral decisions in IPR2025-01342 and IPR2025-01383 issued on November 20, 2025, therefore the deadline to request Director Review was December 4, 2025*. Patent Owner's request for an extension of approximately two months to Request Director Review, if granted, could undermine the efficient administration of the statutory trial schedule.

Patent Owner also fails to establish good cause. Patent Owner asserts that "good cause supports the introduction of additional evidence and arguments as submitted in IPR2026-00002" because it was allegedly unaware of Petitioner's "settled expectations" theories and lacked an opportunity to

respond during the initial discretionary-denial proceedings. That is not correct. Petitioner presented its settled expectations arguments in the '342 IPR on November 7, 2025 (Paper 8), and in the '383 IPR on November 19, 2025 (Paper 9). The PTAB provides parties the opportunity to "seek leave to file further briefing . . . for good cause", but Patent Owner did not request a Reply in either IPR. *See* March 26, 2025 Memorandum: Interim Processes for PTAB Workload Management. Instead, Patent Owner responded to Petitioner's settled expectations arguments in subsequent IPRs. For example, on November 24, 2025, Patent Owner filed a Request for discretionary denial of IPR2025-01524 and argued that "Petitioner has suggested in other proceedings involving different AutoConnect patents that its business relationship with Flextronics—a prior assignee of the application underlying the '186 patent—somehow undermines settled expectations." IPR2025-01524, Paper 6 at 6-7 *citing* IPR2025-01383, Paper 9 at 18-19.

Moreover, the settled-expectations arguments and evidence Patent Owner now seeks to introduce from IPR2006-00002 are largely cumulative of those presented in IPR2025-01524. Compare IPR2025-01524, Paper 6 at 4–8 and Paper 8 at 1–3 with IPR2026-00002, Paper 6 at 4–9 and Paper 9 at 1–2. The Director has already issued a decision referring the '524 IPR for review of the merits and non-discretionary considerations, which suggests that Patent Owner's settled expectations arguments and evidence that it seeks to introduce here, were already found unpersuasive. IPR2025-01524, Paper 9 at 2.

For these reasons, Petitioner respectfully opposes Patent Owner's request.

*Petitioner respectfully requests clarification whether the issuance of a detailed opinion subsequent to a decision affects the timing requirements of § 42.71(d). *See e.g.*, IPR2025-01342, Papers 9 and 10.

Andy Turner

Brooks Kushman P.C.

(248) 226-2707

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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Wednesday, January 28, 2026 4:58 PM
To: Eric Zelepugas <zelepugas@avantechlaw.com>
Cc: Andrew B. Turner <aturner@brookskushman.com>; John S. LeRoy

<jleroy@brookskushman.com>; Christopher C. Smith <csmith@brookskushman.com>; FPGP0147IPR@brookskushman.com; FPGP0156IPR <FPGP0156IPR@brookskushman.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>
Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Requests for submission of new evidence/arguments and extension of time for requests for Director Review

Counsel,

Petitioner may respond with its position as to Patent Owner's request via email by Thursday, January 29, 2026.

Thanks.

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Wednesday, January 28, 2026 1:09 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Andrew B. Turner <aturner@brookskushman.com>; John S. LeRoy <jleroy@brookskushman.com>; Christopher C. Smith <csmith@brookskushman.com>; FPGP0147IPR@brookskushman.com; FPGP0156IPR <fpgp0156ipr@brookskushman.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>
Subject: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Requests for submission of new evidence/arguments and extension of time for requests for Director Review

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Director,

Patent Owner intends to seek Director Review of the discretionary decisions referring the petitions in IPR2025-01342 and IPR2025-01383 (the "First DD Proceedings"). In connection

with those requests, Patent Owner respectfully seeks (1) authorization to submit new evidence and arguments in support of its requests under § 42.75(c)(3), and (2) extensions of time to file the requests for Director Review under § 42.75(c)(1). As set forth below, Patent Owner submits that good cause exists for both requests under 37 C.F.R. § 42.75(c).

The First DD Proceedings involved issues of first impression related to settled expectations that resulted in a detailed Director opinion. *See, e.g., Ford Motor Company v. AutoConnect Holdings LLC*, IPR2025-01342, Paper 10 (Director, Dec. 4, 2025). In those proceedings, the decisions relied on factual assertions and legal theories concerning settled expectations based on a supply relationship with an earlier owner of the patents. Patent Owner did not have an opportunity to respond to Petitioner's new facts and arguments on these issues prior to issuance of the decisions in the First DD Proceedings. Those issues were subsequently raised and more fully addressed in a later proceeding involving the same parties. Specifically, Patent Owner submitted additional evidence and arguments directly addressing these settled expectations issues underlying the First DD Decisions in IPR2026-00002. On that record, the Director exercised discretion to deny institution. *See Ford Motor Company v. AutoConnect Holdings LLC*, IPR2026-00002, Paper 10 (Director, Jan. 27, 2026). The Director indicated that a detailed opinion is forthcoming. *Id*. at 1.

Patent Owner submits that good cause supports the introduction of additional evidence and arguments as submitted in IPR2026-00002 in support of its Request for Director Review here, as Patent Owner was unaware of Petitioner's novel settled expectations theory and did not have the opportunity to address it in the First DD Proceedings, and allowing such additional evidence and arguments here would promote consistency, fairness, and informed decision-making.

Patent Owner further submits that good cause supports an extension of the deadline for Patent Owner's requests for Director Review to permit Patent Owner to address the forthcoming written decision in IPR2026-00002, which may further describe the Director's analysis of the same settled expectations issues presented here. Accordingly, Patent Owner requests an extension of the deadline for its requests for Director Review until three days after issuance of the forthcoming written opinion in IPR2026-00002.

For these reasons, Patent Owner respectfully submits that good cause exists and requests authorization to submit additional evidence and arguments not already of record in the First

DD Proceedings, as well as authorization for extensions of time to file its requests for Director Review of the First DD Decisions.

Respectfully submitted,

Eric A. Zelepugas

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