

From: [Director_PTABDecision_Review](#)
To: ["Eric Zelepugas"](#); [Andrew B. Turner](#); [Director_PTABDecision_Review](#); [John S. LeRoy](#); [Christopher C. Smith](#); [FPGP0147IPR@brookskushman.com](#); [FPGP0156IPR](#); [AutoConnect \(Post-Grant\)](#)
Subject: IPR2025-01342, IPR2025-01383 - Patent Owner Requests for Authorization to Submit Replies in Support of Requests for Director Review - Granted in part
Date: Tuesday, February 17, 2026 6:04:00 PM

Counsel,

Patent Owner's request for authorization to file a reply brief in support of its requests for Director Review in the above identified proceedings is granted in part. Patent Owner is authorized to file its brief no later than February 20th, limited to two pages addressing Petitioner's claim construction positions in the parallel litigation. Petitioner is authorized to file a response also limited to two pages no later than February 25th.

Thanks

IPR2025-01342
Ex. 3103

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Friday, February 13, 2026 9:22 AM
To: Andrew B. Turner <aturner@brookskushman.com>; Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; 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 - Patent Owner Requests for Authorization to Submit Replies in Support of Requests for Director Review

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Director,

Patent Owner writes to clarify the record in this case with respect to Topic 3 and to explain why supplemental briefing is warranted. Last Friday, Petitioner served contentions advancing numerous indefiniteness positions, asserting that at least eight terms in each independent claim of the '697 patent are indefinite and that at least five terms in each independent claim of the '153 patent are indefinite.

Before serving those contentions, however, Petitioner (Ford) had advanced only a single indefiniteness argument—when it unsuccessfully moved to dismiss the parallel Ford action based on the alleged indefiniteness of the phrase “and/or.” In responding to concerns regarding potential inconsistency, Ford argued that its position in district court

did not conflict with its IPR petition because the petition demonstrated obviousness under both the conjunctive and disjunctive constructions. See IPR2025-01383, Paper 9 at 10. At no point during the petition stage or in connection with Patent Owner's request for Director Review did Ford disclose that it intended to pursue a sweeping set of additional indefiniteness theories targeting numerous other claim terms.

Accordingly, when Patent Owner sought Director Review, there were no broader indefiniteness positions before the Board to address. Ford omitted any reference to those theories—positions it would not be required to disclose until after the Director Review briefing was complete. These newly asserted positions raise materially different and more expansive issues than the isolated “and/or” argument previously presented. In light of the Director's guidance in *Revvo* and *Tesla* regarding inconsistent positions, Patent Owner respectfully submits that supplemental briefing is warranted, consistent with the procedure outlined in *Generac Power Sys., Inc., v. Champion Power Equip., Inc.*, IPR2025-00805, Paper 40 at 2 (Feb. 3, 2026).

Respectfully submitted,

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From: Andrew B. Turner <aturner@brookskushman.com>

Sent: Thursday, February 12, 2026 3:56:32 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; Eric Zelepugas <zelepugas@avantechlaw.com>; John S. LeRoy <jleroy@brookskushman.com>; Christopher C. Smith <csmith@brookskushman.com>; FPGP0147IPR@brookskushman.com <FPGP0147IPR@brookskushman.com>; FPGP0156IPR@brookskushman.com <FPGP0156IPR@brookskushman.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>

Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Patent Owner Requests for Authorization to Submit Replies in Support of Requests for Director Review

Director,

Petitioner opposes Patent Owner's request for authorization to file a reply in support of its Requests for Director Review in IPR2025-01342 (Paper 13) and IPR2025-01383 (Paper 14). Patent Owner has not established good cause for the requested reply.

Patent Owner contends that Petitioner's arguments concerning (1) a declaration from a Ford employee, (2) intervening rights, and (3) indefiniteness raised in district court “present new facts that Patent Owner could not have addressed in its Request for Director Review.”

As to points (1) and (2), Petitioner's arguments regarding the Ford employee declaration and

intervening rights were directly responsive to Patent Owner's arguments and were previously raised in IPR2026-00002. (See IPR2026-00002, Paper 8 at 1, 5-6, 8-9.) In that proceeding, Patent Owner sought and received authorization to file a reply addressing these same arguments and filed its authorized reply on January 14, 2026. (IPR2026-00002, Ex. 3101, Paper 9.) Patent Owner's Director Review arguments in IPR2025-01342 and IPR2025-01383 repeat the arguments it advanced in IPR2026-00002 on these issues. (Compare IPR2026-00002, Paper 9 at 1-2 with IPR2025-01342, Paper 13 at 8-10.) Accordingly, Patent Owner's request lacks good cause and appears to seek another opportunity to re-argue positions that the Board can already evaluate based on the existing record.

With respect to point (3), Patent Owner raised indefiniteness in its original requests for discretionary denial in both IPRs (IPR2025-01342, Paper 7 at 6; IPR2025-01383, Paper 8 at 6), and Petitioner responded to these arguments in its corresponding oppositions briefs. Patent Owner did not raise indefiniteness in its Requests for Director Review; therefore Petitioner's authorized Responses did not address that issue. Patent Owner's present request is therefore untimely and seeks to exceed the permissible scope of a reply.

Respectfully,

Andy Turner

Brooks Kushman P.C.

(248) 226-2707

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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>

Sent: Wednesday, February 11, 2026 8:13 AM

To: Eric Zelepugas <zelepugas@avantechlaw.com>; John S. LeRoy <jleroy@brookskushman.com>; Christopher C. Smith <csmith@brookskushman.com>; FPGP0147IPR@brookskushman.com; FPGP0156IPR@brookskushman.com; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>; Andrew B. Turner <aturner@brookskushman.com>

Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Patent Owner Requests for Authorization to Submit Replies in Support of Requests for Director Review

Counsel,

Petitioner may respond with its position as to Patent Owner's request via email by Thursday, February 12, 2026.

Thanks.

From: Eric Zelepugas <zelepugas@avantechlaw.com>

Sent: Tuesday, February 10, 2026 6:54 PM

To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>; 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>; Andrew B. Turner <aturner@brookskushman.com>

Subject: Re: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Patent Owner Requests for Authorization to Submit Replies in Support of Requests for Director Review

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Director,

Patent Owner requests authorization to file a 2-page reply brief in support of its requests for Director Review. This request is necessary to address two new factual arguments Ford made in its responses yesterday that Patent Owner has never had a chance to address, and to inform the Board of a development in the parallel litigation that occurred last Friday.

First, Ford cites to a declaration from its employee it submitted in another proceeding to support a new factual claim it never made before and that the declaration does not support.

Second, Ford advances a brand new “intervening rights” argument based on Ford’s activities in the 2023-2024 time frame for which it provides no factual support, and which facts contradict its arguments that Flextronics has been and continues to supply the accused system since 2014.

Third, Ford served invalidity contentions last Friday in the parallel litigation asserting that at least 8 terms of each independent claim of the ’697 patent are indefinite, and at least 5 terms of each independent claim of the ’153 patent are indefinite. Yet Ford has not provided a sufficient reason for taking such an inconsistent position in these IPR proceedings. *See Revvo Techs., Inc. v. Cerebrum Sensor Techs., Inc.*, IPR2025-00632, Paper 20 (Director Nov. 3, 2025) (precedential); *Tesla, Inc., v. Intellectual Ventures II LLC*, IPR2025-00340, Paper 18 (Director Nov. 5, 2025) (informative).

As each of these arguments presents new facts that Patent Owner could not have addressed in its Request for Director Review, Patent Owner believes this request is supported by good cause.

Respectfully submitted,

Eric A. Zelepugas



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From: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Sent: Monday, February 9, 2026 9:35 AM
To: Eric Zelepugas <zelepugas@avantechlaw.com>; 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>; Andrew B. Turner <aturner@brookskushman.com>
Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01342, IPR2025-01383 - Request denied

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.

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 <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

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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@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](mailto:FPGP0156IPR@brookskushman.com) <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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