

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,

v.

AUTOCONNECT HOLDINGS, LLC
Patent Owner.

U.S. Patent No. 9,020,697 to Ricci et al.

Case No.: IPR2025-01342

**PETITIONER'S UNOPPOSED MOTION FOR *PRO HAC*
VICE ADMISSION OF YASMEEN MORADSHAHI
PURSUANT TO 37 C.F.R. § 42.10**

Pursuant to 37 C.F.R. § 42.10, Petitioner respectfully requests the *pro hac vice* admission of attorney Yasmeen Moradshahi in this proceeding. The facts, supported by the attached Declaration of Yasmeen Moradshahi in Support of Motion for Admission *Pro Hac Vice* (“Moradshahi Decl.”), establish good cause to admit Ms. Moradshahi *pro hac vice* in this proceeding. Petitioner conferred with Patent Owner, and Patent Owner confirmed that it does not oppose this Motion.

I. STATEMENT OF FACTS

Lead counsel Andrew B. Turner is a registered practitioner (Reg. No. 63,121) and experienced in *inter partes* proceedings in the USPTO. Backup counsel John S. LeRoy (Reg. No. 48,158) and Christopher C. Smith (Reg. No. 59,669) are registered practitioners and experienced in *inter partes* proceedings in the USPTO. Along with Mr. LeRoy and Mr. Smith, Ms. Moradshahi represents Ford Motor Company in the district court action captioned *AutoConnect Holdings, LLC v. Ford Motor Company*, 1:24-cv-01327-JCG (D. Del) pending before the United States District Court for Delaware.

Ms. Moradshahi joined Brooks Kushman in 2020 as an intellectual property technical specialist. In 2021, Ms. Moradshahi continued working as a law clerk while attending law school and then began working as a litigation associate in 2024 after graduating law school. (Moradshahi Decl., ¶ 1.)

Since joining Brooks Kushman, Ms. Moradshahi has primarily focused her

practice on patent litigation. (*Id.*, ¶ 2.) In that time, Ms. Moradshahi has gained experience conducting technical infringement and validity analysis, working with technical experts to prepare reports on infringement and validity issues, preparing for depositions of technical experts and fact witnesses, briefing claim construction issues, and drafting dispositive motions on a range of technical issues. (*Id.*) Further, Ms. Moradshahi has assisted her colleagues at Brooks Kushman in proceedings before the Board, and she is familiar with its established practices. (*Id.*)

Ms. Moradshahi is a member in good standing of the Michigan State Bar and is admitted to practice in the United States District Court for the Eastern District of Michigan. (*Id.*, ¶ 3.)

Ms. Moradshahi has never been suspended or disbarred from practice before any court or administrative body. (*Id.*, ¶ 4.) She has never had an application for admission to practice before any court or administrated body denied. (*Id.*) Nor has any court or administrative body imposed sanctions or contempt citations against her. (*Id.*)

Ms. Moradshahi has read and will comply with the Patent Office Trial Practice Guide and the Board's Rules for Practice for Trials set forth in 37 C.F.R. 42. (*Id.*, ¶ 5.) She acknowledges and agrees to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to

disciplinary jurisdiction under 37 C.F.R. § 11.19(a). (*Id.*, ¶ 6.) Ms. Moradshahi has not previously applied to appear *pro hac vice* before the Office (aside from related proceeding IPR2025-01383) in the last three years.

Ms. Moradshahi has established familiarity with the subject matter at issue in this proceeding. (*Id.*, ¶ 7.) She has reviewed in detail and is familiar with U.S. Patent No. 9,020,697 and all exhibits relied upon by Petitioner in this proceeding. (*Id.*) Ms. Moradshahi has also assisted in drafting the Petition in this proceeding. (*Id.*) Moreover, Ms. Moradshahi has engaged and will continue to engage in extensive strategic and substantive discussions regarding this proceeding with Mr. Turner, Mr. LeRoy and Mr. Smith who are registered practitioners and counsel for Petitioner in this proceeding. (*Id.*)

II. ANALYSIS

The facts contained in the Statement of Facts above and Ms. Moradshahi's Declaration establish that there is good cause to admit Ms. Moradshahi *pro hac vice* in this proceeding under 37 C.F.R. § 42.10. Lead counsel Mr. Turner and backup counsel Mr. LeRoy and Mr. Smith are registered practitioners and experienced in *inter partes* proceedings in the USPTO. Ms. Moradshahi is an experienced patent litigation attorney, and she has an established familiarity with the subject matter at issue in this proceeding.

III. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests the Board admit Yasmeeen Moradshahi *pro hac vice* in this proceeding.

Respectfully submitted,

Dated: March 5, 2026

/ Andrew B. Turner /
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Certificate of Service

The undersigned hereby certifies that on March 5, 2026, a complete and entire copy of **Petitioner's Unopposed Motion for *Pro Hac Vice* Admission**, was served via electronic mail to the attorneys listed below:

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Respectfully submitted,

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