UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY
Petitioner,
v.

AUTOCONNECT HOLDINGS LLC,
Patent Owner.

IPR2025-01342
Patent 9,020,697

PATENT OWNER'S UNOPPOSED NOTICE OF INTENT TO DESIGNATE WILLIAM R. WOODFORD AS A PROVISIONALLY RECOGNIZED PTAB ATTORNEY ELIGIBLE FOR AUTOMATIC *PRO HAC VICE* ADMISSION AS BACK-UP COUNSEL PURSUANT TO 37 C.F.R. § 42.10

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.10(c)(2), Patent Owner AutoConnect Holdings LLC ("Patent Owner") respectfully files a notice of intent to designate William R. Woodford as a provisionally recognized PTAB attorney eligible for automatic *pro hac vice* admission as backup counsel in this proceeding. The facts, supported by the attached Declaration of William R. Woodford in Support of Notice of Intent to Designate a Provisionally Recognized PTAB attorney as Back-up Counsel ("Woodford Decl."), establish Mr. Woodford is a provisionally recognized PTAB attorney eligible for automatic *pro hac vice* admission in this proceeding. Patent Owners conferred with Petitioner, and Petitioner confirmed that it does not oppose this Notice.

Lead Counsel for Patent Owner, Eric A. Zelepugas, is a registered practitioner (Reg. No. 73,302) and experienced in *inter partes* proceedings in the USPTO. Proposed backup counsel, William Woodford, is not a registered practitioner with the USPTO but has been admitted to appear *pro hac vice* in *post grants* review proceedings before the USPTO, most recently including PGR2025-00041. Woodford Decl. ¶ 5. Mr. Woodford has been admitted to appear *pro hac vice* in other proceedings, such as PGR2025-00041. *Id*. Mr. Woodford has never been denied permission to appear *pro hac vice* in a Board proceeding. *Id*.

Mr. Woodford is admitted to the bar of the State of Minnesota and the Commonwealth of Massachusetts, remains in good standing, and has never been

suspended or disbarred by any court or administrative body. Decl. ¶ 3. He has never had an application for admission to practice before any court or administrative body be denied, and he has never by subjected to sanctions or contempt. *Id.* at 7.

Mr. Woodford has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of 37 C.F.R. *Id*. at ¶ 4. He also 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*.

Mr. Woodford also represents AutoConnect Holdings LLC in connection with the pending district court actions in which U.S. Patent No. 9,020,697 has been asserted, including *AutoConnect Holdings LLC v. Toyota Motor Corporation, et al.,* Case No. 2:24-cv-00802 (Eastern District of Texas) and *AutoConnect Holdings LLC v. Ford Motor Company* Case No. 2:24-cv-1327 (District of Delaware). Decl. ¶ 6. Based on his involvement in these proceedings, Mr. Woodford has considerable working knowledge of the '697 patent and has established familiarity with both the law and facts at issue in this proceeding. *Id*.

For the foregoing reasons, Patent Owner respectfully files a notice of intent to designate William R. Woodford as a provisionally recognized PTAB attorney eligible for automatic *pro hac vice* admission in this proceeding.

Patent Owners will subsequently file updated mandatory Notices in the referenced proceeding in accordance with 37 C.F.R. § 42.8(b)(3), identifying Mr. Woodford as backup counsel.

Dated: April 9, 2026

Respectfully submitted,
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/Eric A. Zelepugas/
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USPTO Registration No. 73,302

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Lead Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S UNOPPOSED NOTICE OF INTENT TO DESIGNATE WILLIAM R. WOODFORD AS A PROVISIONALLY RECOGNIZED PTAB ATTORNEY ELIGIBLE FOR AUTOMATTIC *PRO HAC VICE* ADMISSION AS BACK-UP COUNSEL PURSUANT TO 37 C.F.R. § 42.10** and **DECLARATION OF WILLIAM R. WOODFORD IN SUPPORT OF PATENT OWNER'S NOTICE OF INTENT TO DESIGNATE WILLIAM R. WOODFORD AS A PROVISIONALLY RECOGNIZED PTAB ATTORNEY ELIGIBLE FOR AUTOMATTIC *PRO HAC VICE* ADMISSION AS BACK-UP COUNSEL PURSUANT TO 37 C.F.R. § 42.10** was served electronically via e-mail on April 9, 2026, in its entirety on the following counsel of record for Petitioner:

Andrew Turner (Lead Counsel)
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Dated: April 9, 2026

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/Eric A. Zelepugas/

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Lead Counsel for Patent Owner