

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. 9,290,153, to Ricci et al.

Case No.: IPR2025-01383

**DECLARATION OF YASMEEN MORADSHAHI IN SUPPORT OF
PETITIONER'S MOTION FOR *PRO HAC VICE* ADMISSION**

I, Yasmeen Moradshahi, hereby declare the following:

1. I joined Brooks Kushman P.C. in 2020 as an intellectual property technical specialist. In 2021, while attending law school, I continued with the firm as a law clerk. After graduating, I began working as a litigation associate in 2024. I received my J.D. from the University of Detroit Mercy School of Law in 2024. I hold a bachelor's degree in electrical engineering from Kettering University, which I received in 2020.

2. Since joining Brooks Kushman, I have primarily focused my practice on patent litigation. I have 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. I have assisted my colleagues at Brooks Kushman in proceedings before the Board and am familiar with its established practices.

3. I am a good standing member of the State Bar of Michigan. I am admitted to practice in the United States District Courts for the Eastern District of Michigan.

4. I have not been suspended or disbarred from practice before any court or administrative body. I have never had an application for admission to practice before any court or administrative body denied. No sanction or contempt citation has

been imposed against me by any court or administrative body.

5. I have read and will comply with the Patent Office Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of Title 37 of the Code of Federal Regulations (37 C.F.R. § 42).

6. I will be subject to the U.S. Patent and Trademark Office Rules of Professional Conduct set forth in 37 C.F.R. § 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). I have not previously applied to appear *pro hac vice* before the Office (aside from related proceeding IPR2025-01342) in the last three years.

7. I have established familiarity with the subject matter at issue with this proceeding. I have reviewed in detail and am familiar with U.S. Patent No. 9,290,153 and all exhibits relied upon by Petitioner in this proceeding. I am engaged and will continue to engage in extensive strategic and substantive discussions regarding this proceeding with Andrew B. Turner, who is a registered practitioner and the lead counsel for Petitioner in this proceeding.

8. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful

statements may jeopardize the validity of the application or any patents issued thereon.

Respectfully submitted,

Date: March 5, 2026

/ Yasmeen Moradshahi /

Yasmeen Moradshahi

Brooks Kushman P.C.

150 W. Second St.

Suite 400N

Royal Oak, MI 48067

(248) 358-4400

Email: ymoradshahi@brookskushman.com