

From: [Director Discretionary Decision](#)
To: [Eric Zelepugas](#); [Director Discretionary Decision](#)
Cc: [FPGP0151IPR](#); [kkonz@brookskushman.com](#); [AutoConnect \(Post-Grant\)](#); [John S. LeRoy](#); [Christopher C. Smith](#); [Robert Conley](#); [Andrew B. Turner](#)
Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01524 – Request for Reply Brief to Petitioner's Opposition to Patent Owner's Requests for Discretionary Denial
Date: Monday, December 29, 2025 3:16:44 PM

Patent Owner is authorized to file a 3-page reply in IPR2025-01524, due no later than Wednesday, December 31, 2025, limited to addressing the arguments raised below.

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Wednesday, December 24, 2025 2:19 PM
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Subject: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01524 – Request for Reply Brief to Petitioner's Opposition to Patent Owner's Requests for Discretionary Denial

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Director:

Patent Owner respectfully requests authorization to file a short 3-page reply brief in support of its Request for Discretionary Denial in IPR2025-01524. Good cause exists because Petitioner's opposition introduces new evidence and intervening legal authority that Patent Owner could not have addressed in its original submission.

Specifically, Petitioner relies on newly submitted exhibits—including an employee declaration—to advance its settled-expectations arguments based on alleged dealings with Flextronics. Exs. 1117–1119, 1121. Patent Owner has had no opportunity to respond to or rebut this evidence and associated argument.

And Petitioner's opposition relies heavily on the Director's discretionary denial decision in IPR2025-01383 and IPR2025-01342, which issued on December 4, 2025—nearly two weeks after Patent Owner filed its discretionary denial request in this proceeding. *See* Paper 7 at 1, 3–5, 8; *Ford Motor Co. v. AutoConnect Holdings LLC*, IPR2025-01383, Paper 11 (Director Dec. 4, 2025); *Ford Motor Co. v. AutoConnect Holdings LLC*, IPR2025-01342, Paper 10 (Director Dec. 4, 2025).

Allowing a limited reply narrowly tailored to addressing (i) Petitioner's newly introduced evidence and (ii) its reliance on the recent Director decision would promote fairness and ensure a complete and balanced record for the Director's consideration, without expanding the scope of the issues already presented.

Accordingly, Patent Owner respectfully requests authorization to file a reply brief limited to these matters.

Best regards,

Eric A. Zelepugas



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