

From: [Director Discretionary Decision](#)
To: [Eric Zelepugas](#); [Director Discretionary Decision](#)
Cc: [Andrew B. Turner](#); [John S. LeRoy](#); [kkonz@brookskushman.com](#); [Christopher C. Smith](#); [FPGP0151IPR](#); [AutoConnect \(Post-Grant\)](#); [Robert Conley](#)
Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01524 - Request for Supplemental Briefing in view of Changed Circumstances
Date: Monday, March 2, 2026 12:37:56 PM

The request is denied as moot.

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Monday, February 23, 2026 4:51 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Cc: Andrew B. Turner <aturner@brookskushman.com>; John S. LeRoy <jleroy@brookskushman.com>; kkonz@brookskushman.com; Christopher C. Smith <csmith@brookskushman.com>; FPGP0151IPR <fpgp0151ipr@brookskushman.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>; Robert Conley <conley@avantechlaw.com>
Subject: Ford Motor Company v. AutoConnect Holdings LLC - IPR2025-01524 - Request for Supplemental Briefing in view of Changed Circumstances

CAUTION: This email has originated from a source outside of USPTO. PLEASE CONSIDER THE SOURCE before responding, clicking on links, or opening attachments.

Director:

Patent Owner respectfully requests authorization to file a 3-page supplemental brief based on changed circumstances.

On February 6, 2026, about a month after the Director referred the petition at issue, Petitioner served invalidity contentions in the parallel litigation alleging twenty terms across the challenged claims are indefinite. The parties' discretionary denial briefs addressed this issue, but only with respect to the term "and/or." Petitioner unsuccessfully argued this phrase was indefinite in a motion dismiss the parallel litigation. Petitioner's new positions, first disclosed on February 6, 2026, raise materially different and more expansive issues than the "and/or" claim language, and could not have been addressed by Patent Owner in its earlier briefs. In light of the Director's guidance in *Revvo* and *Tesla* regarding inconsistent positions, and this new information, Patent Owner respectfully submits that good cause exists for such supplemental briefing on these additional terms, consistent with the procedure outlined in *Generac Power Sys., Inc., v. Champion Power Equip., Inc.*, IPR2025-00805, Paper 40 at 2 (Feb. 3, 2026). Accordingly, Patent Owner respectfully requests authorization to file a supplemental brief limited to these matters.

Best regards,

Eric A. Zelepugas



312-487-2185

zelepugas@avantechlaw.com

[LinkedIn](#) | [Firm Bio](#)

This message may contain confidential information for the intended recipient. If you receive this email in error, please reply indicating the error and delete this message.

This message may contain proprietary, confidential, and privileged information. If you are not the intended recipient, please contact the sender and permanently delete all copies of this message.