

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AUTOCONNECT HOLDINGS LLC,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 2:24-cv-1327-JCG

**AUTOCONNECT’S DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS AGAINST FORD**

Pursuant to Paragraph 2 of the October 27, 2025 Scheduling Order (D.I. 27) in this matter, Plaintiff AutoConnect Holdings LLC (“AutoConnect”) hereby serves its Disclosure of Asserted Claims and Infringement Contentions against Defendant Ford Motor Company (“Ford”). AutoConnect has previously served its Document Production Accompanying Disclosure.

These disclosures are based on publicly available information that describes or discusses relevant features of the Accused Instrumentalities. AutoConnect’s investigation of relevant facts is ongoing. AutoConnect has not received any discovery from Ford, and the Court has not yet construed the claims. Further, important information about many or all of Ford’s Accused Instrumentalities and other products is not publicly available, including technical information relevant to the Asserted Patents and Accused Instrumentalities. Accordingly, AutoConnect reserves the right to modify and/or supplement these disclosures as information becomes available, such as based on new information learned through discovery, the Court’s claim construction rulings, and/or positions taken by Ford.

I. IDENTIFICATION OF ASSERTED CLAIMS¹

AutoConnect asserts U.S. Patent No. 9,020,491 (“the ’491 patent”), U.S. Patent No. 9,020,697 (“the ’697 patent”), U.S. Patent No. 9,082,239 (“the ’239 patent”), U.S. Patent No. 9,098,367 (“the ’367 patent”), U.S. Patent No. 9,116,786 (“the ’786 patent”), U.S. Patent No. 9,123,186 (“the ’186 patent”), U.S. Patent No. 9,140,560 (“the ’560 patent”), U.S. Patent No. 9,147,296 (“the ’296 patent”), U.S. Patent No. 9,147,297 (“the ’297 patent”), U.S. Patent No. 9,173,100 (“the ’100 patent”), U.S. Patent No. 9,290,153 (“the ’153 patent”), U.S. Patent No. 10,862,764 (“the ’764 patent”), and U.S. Patent No. 11,163,931 (“the ’931 patent”) (collectively, the “Asserted Patents”) against Ford. AutoConnect contends that Ford infringes the following Asserted Claims of the Asserted Patents based on its activities (as described herein) related to the Accused Instrumentalities:

Asserted Patents	Asserted Claims
’491 Patent	Claims 11, 12, 13, 14, 15, and 16 (the “’491 Asserted Claims”)
’697 Patent	Claims 1, 3, 4, 5, 8, 11, 12, 15, 18, 19 (the “’697 Asserted Claims”)
’239 Patent	Claims 1, 2, 5, 7, 8, 9, 12, 15, 16, 19, 21, 22, 29, 31, 33, and 35 (the “’239 Asserted Claims”)
’367 Patent	Claims 1, 2, 3, 8, 9, 10, 11, 12, 15, 16, 17, 18, 19, 22, 23, 24, 27, 28, 29, and 30 (the “’367 Asserted Claims”)
’786 Patent	Claims 1, 2, 7, 8, 9, 11, 23, and 24 (the “’786 Asserted Claims”)
’186 Patent	Claims 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, 20 (the “’186 Asserted Claims”)
’560 Patent	Claims 11, 12, 13, 15, and 16 (the “’560 Asserted Claims”)
’296 Patent	Claims 1, 3, 4, 6, 7, 8, 9, 11, 13, 14, 15, 17, 19, 20 (the “’296 Asserted Claims”)

¹ D.I. 27, ¶ 2(a).

Asserted Patents	Asserted Claims
'297 Patent	Claims 1, 4, 5, 6, 7, 8, 9, 12, 13, 14, 15, 17, 18, 19, and 20 (the "'297 Asserted Claims")
'100 Patent	Claims 1, 2, 3, 7, 9, 10, 11, 15, 17, 18, 19, and 23 (the "'100 Asserted Claims")
'153 Patent	Claims 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, 20, 21 (the "'153 Asserted Claims")
'764 Patent	Claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 17, 18, 19, and 20 (the "'764 Asserted Claims")
'931 patent	Claims 1, 2, 3 (the "'931 Asserted Claims")

II. IDENTIFICATION OF ACCUSED INSTRUMENTALITIES²

The Accused Instrumentalities include at least the following, as well as instrumentalities with reasonably similar functionality (collectively, the "Accused Instrumentalities").

AutoConnect's identification of the Accused Instrumentalities is based on information reasonably available at this time. AutoConnect reserves the right to amend and/or supplement its identification of the Accused Instrumentalities as new information becomes available through discovery, additional factual investigation, the Court's claim construction rulings, or other relevant circumstances. AutoConnect further reserves the right to amend and/or supplement its identification of Accused Instrumentalities to add newly released products or other equivalent or infringing products ascertained through discovery. Further, if any Accused Instrumentalities have gone through or do go through name changes, but were or will be manufactured, used, offered for sale, sold, or imported with the same accused features or similar features, such products are also

² D.I. 27, ¶ 2(b).

accused. The identified Accused Instrumentalities include all trims and/or versions of the listed vehicles.

Asserted Claims	Accused Instrumentalities
'491 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit A1 (the "'491 Accused Instrumentalities").
'697 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Ford's Phone As A Key feature, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit B1 (the "'697 Accused Instrumentalities").
'239 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems and infotainment systems, in-vehicle multimedia systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Ford Digital Experience or Lincoln Digital Experience (including Android Auto) in Ford vehicles, in the makes and models from the 2024 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit C1 (the "'239A Accused Instrumentalities").
	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems and infotainment systems, in-vehicle multimedia systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Ford Intelligent Suggestions in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-

Asserted Claims	Accused Instrumentalities
	released vehicles with reasonably similar functionality, including those listed in Exhibit C3 (the “’239B Accused Instrumentalities”).
’367 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software and computer readable media that store computer that enable the Ford Digital Experience or the Lincoln Digital Experience in Ford vehicles, in the makes and models from the 2024 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit D1 (the “’367 Accused Instrumentalities”).
’786 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems) and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit E1 (the “’786 Accused Instrumentalities”).
’186 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Ford’s Phone As A Key feature, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit F1 (the “’186 Accused Instrumentalities”).
’560 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems (including in-vehicle multimedia and infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality,

Asserted Claims	Accused Instrumentalities
	including those listed in Exhibit G1 (the “’560 Accused Instrumentalities”).
’296 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer-readable media that store computer-executable instructions and hardware and software that enable Personal Profiles with Phone As A Key in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit H1 (the “’296 Accused Instrumentalities”).
’297 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable connection of multiple user devices in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit I1 (the “’297 Accused Instrumentalities”).
’100 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable security measures in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit J1 (the “’100 Accused Instrumentalities”).
’153 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems (including in-vehicle multimedia and infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit K1 (the “’153A Accused Instrumentalities”).

Asserted Claims	Accused Instrumentalities
	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Ford's Phone As A Key feature in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit K3 (the "'153B Accused Instrumentalities").
'764 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems (including in-vehicle multimedia and infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit L1 (the "'764 Accused Instrumentalities").
'931 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), server systems, mobile applications (including the Ford and Lincoln Apps), computing devices that execute the Ford and Lincoln Apps, and hardware and software components thereof, including non-tangible computer-readable media that stores microprocessor-executable instructions and in-vehicle hardware and software components that enable Ford's Phone As A Key feature, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit M1 (the "'931 Accused Instrumentalities").