

From: [Director Discretionary Decision](#)
To: [Eric Zelepugas](#); [Director Discretionary Decision](#)
Cc: [AutoConnect \(Post-Grant\)](#); [Robert Conley](#); [Andrew B. Turner](#); [John S. LeRoy](#); [Christopher C. Smith](#); [canstess@brookskushman.com](#); [FPGP0153IPR](#)
Subject: RE: Ford Motor Company v. AutoConnect Holdings LLC - IPR2026-00002 – Request for Reply Brief in support of Patent Owner's Request for Discretionary Denial
Date: Monday, January 12, 2026 4:13:18 PM

Patent Owner is authorized to file a 2-page reply in IPR2026-0002, due no later than Wednesday, January 14, 2026, limited to addressing the arguments raised below.

From: Eric Zelepugas <zelepugas@avantechlaw.com>
Sent: Monday, January 12, 2026 1:43 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
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Subject: Ford Motor Company v. AutoConnect Holdings LLC - IPR2026-00002 – Request for Reply Brief in support of Patent Owner's Request for Discretionary Denial

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Director:

Patent Owner respectfully requests authorization to file a 4-page reply brief in support of its Request for Discretionary Denial in IPR2026-00002. Good cause exists because Petitioner's opposition (filed 1/7/26) introduces new evidence (and associated argument) related to the issue of settled expectations 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. 1058-1059, 1061-1062, 1110, 1113, 1117-1118, 1121, 1126, and 1128. Patent Owner has had no opportunity to respond to or rebut this evidence and associated argument.

Allowing a limited reply narrowly tailored to addressing Petitioner's newly introduced evidence 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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