

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

FORD MOTOR COMPANY,
Petitioner

v.

AUTOCONNECT HOLDINGS LLC,
Patent Owner

Case No.: IPR2026-00002
Patent No. 9,147,296

**PATENT OWNER'S REPLY BRIEF IN SUPPORT OF
REQUEST FOR DISCRETIONARY DENIAL**

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

PATENT OWNER’S EXHIBIT LIST

Exhibit	Description
2001	Letter from William Woodford, Counsel for AutoConnect Holdings LLC to Steven Croley, General Counsel for Ford Motor Company, dated December 28, 2023.
2002	Email from Tom Yerbernetsky, Counsel for Ford Global Technologies to William Woodford, Counsel for AutoConnect Holdings LLC, dated March 4, 2024.
2003	Letter from Charles J. Monterio, Jr., Counsel for Ford Motor Company to William Woodford, Counsel for AutoConnect Holdings LLC, dated May 16, 2024.
2004	Letter from Charles J. Monterio, Jr. Counsel for Ford Motor Company to William Woodford, Counsel for AutoConnect Holdings LLC, dated July 22, 2024.
2005	First Amended Docket Control Order, <i>AutoConnect Holdings, LLC v. Toyota Motor Corp.</i> , No. 2:24-CV-00802-JRG-RSP, ECF No. 53 (E.D. Tex. February 13, 2025) (Gilstrap, J.)
2006	ORDER Denying Motion to Dismiss, <i>AutoConnect Holdings, LLC v. Ford Motor Company</i> , No. 1:24-CV-01327-JCG, ECF No. 24 (Dist. of Del. September 24, 2025) (Choe-Groves, J.)
2007	<i>Intentionally left blank</i>
2008	March 24, 2025 Guidance on USPTO’s recission of “Interim Procedure for Discretionary Denials in AIA Post-Grant Proceedings with Parallel District Court Litigation”

2009	October 3, 2025 Update to USPTO Interim Director Discretionary Process
2010	USPTO FAQs for Interim Processes for PTAB Workload Management (Archived)
2011	Scheduling Order, <i>AutoConnect Holdings, LLC v. Ford Motor Company</i> , No. 1:24-CV-01327-JCG, ECF No. 27 (Dist. Of Del. October 27, 2025) (Choe-Groves, J.)
2012	USPTO Fee history for U.S. Patent No. 9,147,296
2013	USPTO Decision on Petition to Accept Unintentionally Delayed Payment of a Maintenance Fee for U.S. Patent No. 9,147,296, December 22, 2022
2014	USPTO Decision on Petition to Accept Unintentionally Delayed Payment of a Maintenance Fee for U.S. Patent No. 9,147,296, April 13, 2023
2015	USPTO EPAS Assignment Cover Sheet and Assignment for U.S. Patent No. 9,147,296, Reel 36503, Frame 62, Executed: May 20, 2015, Recorded: August 28, 2015
2016	USPTO <i>Ex Parte</i> Reexam Statistics (time from filing to reexam certificate)
2017	<i>Ex parte</i> reexam request for U.S. Patent No. 9,147,296
2018	Panasonic Article Regarding Development of Ford's SYNC 3, https://na.panasonic.ca/blog/inside-development-fords-syncr-3 (retrieved December 7, 2025)
2019	October 7, 2015 Business Insider Article Regarding Panasonic and Ford's Creation of SYNC 3,

	https://www.businessinsider.com/sc/panasonic-automotive-and-ford-partnership-2015-10 (retrieved December 7, 2025)
2020	<i>Excerpts of Toyota Invalidity Contentions served April 1, 2025, AutoConnect Holdings, LLC v. Toyota Motor Corp.</i> , No. 2:24-cv-00802-JRG-RSP (E.D. Tex.)
2021	Toyota’s Motion For Leave To Amend Invalidity Contentions, <i>AutoConnect Holdings, LLC v. Toyota Motor Corp.</i> , No. 2:24-cv-00802-JRG-RSP, ECF No. 102 (E.D. Tex. Nov. 12, 2025)
2022	Declaration of Aidan Skoyles in support of Toyota’s Motion For Leave To Amend Invalidity Contentions, <i>AutoConnect Holdings, LLC v. Toyota Motor Corp.</i> , No. 2:24-cv-00802-JRG-RSP, ECF No. 102-1 (E.D. Tex. Nov. 12, 2025)
2023	Information Disclosure Statement citing U.S. Patent No. 9,147,296 in Ford Global Technologies, LLC U.S. App. No. 15/236,771 (Aug. 15, 2016)
2024	Information Disclosure Statement citing U.S. Patent No. 9,147,296 in Ford Global Technologies, LLC U.S. App. No. 16/548,176 (Aug. 22, 2019)
2025	Office Action citing sibling of U.S. Patent No. 9,147,296 (U.S. Patent No. 9,317,983) in Ford Global Technologies, LLC U.S. App. No. 14/065,666 (Nov. 30, 2016)
2026	Information Disclosure Statement citing relative of U.S. Patent No. 9,147,296 (U.S. Pat. App. Pub. No. 2016/0039430) in Ford Global Technologies, LLC U.S. App. No. 14/635,772 (Sept. 21, 2016)
2027	Complaint, <i>AutoConnect Holdings, LLC v. Ford Motor Company</i> , No. 1:24-CV-01327, ECF No. 1 (Dist. of Del. December 6, 2024)

2028	Exhibit H1 to AutoConnect Infringement Contentions identifying vehicles corresponding to Accused Instrumentalities for '296 patent <i>served</i> December 19, 2025, <i>AutoConnect Holdings, LLC v. Ford Motor Company</i> , No. 1:24-CV-01327-JCG, ECF No. 27 (Dist. Of Del.)
------	--

Ford’s excuse for more than a decade of delay in challenging the ’296 patent is a supposed expectation that Flextronics retained license rights to a patent it divested in 2015, covering systems Ford developed years later. ***But Ford offers no evidence that it ever held that belief, or that Flextronics exclusively supplies the accused systems as would be required to support the alleged expectation.***

The ’296 patent is asserted only against Ford model years 2020 and later, and only against systems that combine Phone As A Key (PaaK) with a Personal Profiles feature that loads settings stored to a user profile associated with a user. Exs. 1125 at 6; 2028. To support its “settled expectations” theory, Ford had to show that Flextronics supplied those accused systems. That showing should be simple—if true.

Ford does not make it. It never says that Flex supplied the accused PaaK and Personal Profiles systems, it never ties Flextronics to the relevant model years, and it never claims exclusive supply. And without exclusive supply, no supposed Flextronics license could have shielded Ford from infringement.

Instead, Ford offers a carefully crafted declaration stating only that Flextronics supplies “SYNC modules.” See Paper 8 at 3, 5; Ex. 1121. But SYNC is not a single system. It has been repeatedly overhauled, and Ford does not dispute that later generation systems were supplied by other vendors, including Panasonic. Paper 6 at 7, 8; Paper 8 at 6. Thus, Ford’s vague reference to “SYNC modules”—wholly disconnected from an identification of structure and functionality—does

nothing to show that Flextronics supplies the accused systems.

The 2010 documents Ford cites confirm that point. They predate the '296 patent, and describe systems replaced years before Ford introduced PaaK and Personal Profiles that—most importantly—are not accused of infringement. *Compare* Exs. 1117, 1118, 1059, 1062 *with* Ex. 1125 at 6; Ex. 2028; Ex. 2018 at 1–2; Ex. 2019 at 2–5. Ford’s suggestion (at 3) that they involved user profiles is unsupported. One document says nothing about profiles. Ex. 1059. The other contains only a privacy warning about data being stored by a vehicle as part of a “cellular profile.” Ex. 1062 at 8. Neither has anything to do with PaaK or Personal Profiles—features Ford introduced a decade later.

Ford therefore pivots to a new theory: that it would not expect to be sued by “a current supplier...regardless of the source of the accused goods.” Paper 8 at 6. That position cannot be squared with reality. Ford operates a multi-supplier platform, and cannot reasonably infer immunity when one supplier’s systems infringe another supplier’s divested patent. That is precisely why Ford has consistently advanced the *inaccurate* suggestion that *Flextronics* supplies “the accused SYNC system.” *Id.* at 1, 2, 4.

Because Flextronics did not supply the accused systems, Ford’s supplier-based settled-expectations theory collapses. It does not defeat AutoConnect’s settled expectations, and it does not justify excusing Ford’s 10-year delay in seeking review.

Date: January 14, 2026

Respectfully submitted,
AVANTECH LAW, LLP
80 S 8th St, Suite 900
Minneapolis, MN 55402
(855) 750-9951

/Eric A. Zelepugas/
Eric A. Zelepugas
Registration No. 73,302
Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER'S
REPLY BRIEF IN SUPPORT OF REQUEST FOR DISCRETIONARY
DENIAL** and associated exhibit (Exhibit 2028) were served electronically via e-mail on January 14, 2026 in their entireties on the following counsel of record for Petitioner:

Andrew B. Turner (Lead Counsel)
John S. LeRoy (Backup Counsel)
Christopher M. Smith (Backup Counsel)
Cameron M. Anstess (Backup Counsel)
BROOKS KUSHMAN P.C.
aturner@brookskushman.com
jleroy@brookskushman.com
csmith@brookskushman.com
canstess@brookskushman.com
FPGP0153IPR@brookskushman.com

Date: January 14, 2026

Respectfully submitted,
AVANTECH LAW, LLP
80 S 8th St, Suite 900
Minneapolis, MN 55402
(855) 750-9951

/Eric A. Zelepugas/
Eric A. Zelepugas
Registration No. 73,302
Counsel for Patent Owner