VENABLE LLP

600 MASSACHUSETTS AVE., NW WASHINGTON, DC 20001
T 202.344.4000 F 202.344.8300 www.Venable.com

July 22, 2024

T 202.344.4475
F 202.344.8300
CJMonterio@Venable.com

VIA EMAIL
woodford@avantechlaw.com
William Woodford
Avantech Law, LLP
80 South Eighth Street, Suite 900
Minneapolis, MN 55402

Re: AutoConnect Patent Portfolio

Dear Mr. Woodford:

We write in response to your letter dated June 21, 2024. Your letter fails to provide any additional evidence that overcomes Ford's identified deficiencies as to how or why Ford vehicles infringe any of AutoConnect's patents. For example, as to U.S. Patent Nos. 9,020,491, 9,116,786, 9,140,560, and 10,862,764, your evidence confirms that the claimed steps of those patents are performed by a ***mobile device*** connected to a vehicle and ***not*** by the vehicle itself. As another example, with respect to U.S. Patent Nos. 9,123,186 and 9,147,296, we disagree with your misreading of the claims that detecting a ***mobile device*** in a vehicle equates to detecting a ***vehicle occupant*** in the vehicle. Lastly as an even further example, regarding U.S. Patent Nos. 11,163,931, 9,147,297, 9,147,298 and 9,082,239, you fail to remedy the deficiencies that Ford identified and thus fail to show how Ford vehicles perform each and every claimed limitation of the patents.

With respect to the "second set" of AutoConnect's patents, we continue to disagree that your infringement charts set forth sufficient evidence or explanation showing how or why Ford vehicles infringe. They do not.

Accordingly, Ford considers this matter closed. Based on the evidence provided and our understanding of your allegations, Ford does not infringe any of AutoConnect's patents and therefore does not require a license to any of AutoConnect's patents. We reserve all rights.

Regards,

/s/ Charles J. Monterio Jr.

Charles J. Monterio, Jr.