EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

AUTOCONNECT HOLDINGS LLC, ***Plaintiff,*** **v.** **TOYOTA MOTOR CORPORATION, ET AL.,** ***Defendants.***	**Civil Action 2:24-cv-00802-JRG-RSP** (Lead Case)
AUTOCONNECT HOLDINGS LLC, ***Plaintiff,*** **v.** **GENERAL MOTORS LLC,** ***Defendants.***	**Civil Action No. 2:24-cv-00877-JRG-RSP** (Member Case)

DECLARATION OF AIDAN SKOYLES IN SUPPORT OF TOYOTA DEFENDANTS' MOTION FOR LEAVE TO AMEND INVALIDITY CONTENTIONS

I, Aidan Skoyles, declare as follows:

1. I am an attorney with the law firm Finnegan, Henderson, Farabow, Garrett & Dunner, LLP. I have personal knowledge of the facts contained in this declaration and, if called upon to do so, I could and would testify competently to the matters set forth herein.

2. I am submitting this declaration in support of Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Sales, U.S.A, Inc.'s (collectively "Toyota") motion, submitted jointly with Defendant General Motors LLC ("GM"), (together, "Defendants"), for leave to amend invalidity contentions in this matter.

3. Prior to serving its invalidity contentions, Toyota commissioned a patent prior art search firm, TT Consultants in November 2024, to conduct searches for prior art. Additionally, Toyota has retained experienced experts knowledgeable in the field to assist in identifying and understanding the prior art. I and other Toyota counsel have conducted our own searches for prior art and contacted numerous third parties that may be knowledgeable about systems predating the asserted patents. For example, we corresponded with Dr. Kevin Almeroth regarding connected vehicle systems in use prior to the effective filing dates of the asserted patents.

4. Toyota also worked diligently to collect documentation internally regarding prior art Toyota systems such as Smart Key and Memory Call. Toyota located New Car Features documents and Wiring Diagrams for several vehicles describing the operation of these systems. This documentation was incorporated into invalidity contention claim charts where applicable.

5. On April 1, 2025, Toyota and GM served their invalidity contentions on AutoConnect in compliance with L.P.R. 3-3 and 3-4. See Dkt. No. 59; 60.

6. After invalidity contentions were served, searching continued for additional prior art patents and related publications. In July, Toyota identified additional vehicles such as the 2008 Lexus LS600hL, the 2007 Lexus LS460, the 2009 Lexus LS460, the Land Cruiser 200, and the 2008 Lexus LX750 as being relevant prior art. Toyota also identified the Owner's Manuals for certain vehicles as containing similar documentation of the Smart Key and Memory Call function to what was described in the New Car Features and Wiring Diagrams that had been relied upon in the initial invalidity contentions. Toyota counsel worked to promptly develop supplemental invalidity contention charts relying on disclosures from these Owner's Manuals.

7. On July 10 and August 13, several months after the initial invalidity contention due date, we received documents from Ford Motor Company related to Ford's SYNC prior art system.

Toyota promptly included invalidity contention charts for the SYNC system in the August service six days later.

8. On August 19, 2025, Defendants informed AutoConnect that they had identified additional relevant prior art and served supplemental invalidity contentions including a cover pleading with a red-line showing the minimal changes and some additional claim charts.

9. Attached hereto as Exhibit C is a true and correct copy of Toyota's Cover Pleading of its Amended Preliminary Invalidity Contentions served August 19, 2025, showing redlines from the Invalidity Contentions served initially on April 1, 2025.

10. Attached hereto as Exhibit D is a true and correct copy of an email chain between counsel for the parties regarding Toyota's proposal to amend its invalidity contentions.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 12th day of November, 2025, in Washington, DC.

/s/ Aidan C. Skoyles
Aidan Skoyles

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, LLP
901 New York Avenue, NW
Washington, DC 20001-4413
Tel. (202) 408-4000