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VIA EMAIL
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William Woodford
Avantech Law, LLP
80 South Eighth Street, Suite 900
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Re: AutoConnect Patent Portfolio

Dear Mr. Woodford:

We represent Ford Motor Company ("Ford"). We write in response to your letter dated December 28, 2023, to Ford regarding a licensing discussion with AutoConnect Holdings LLC ("AutoConnect") with respect to certain AutoConnect patents. We have reviewed the AutoConnect patents and your allegations of infringement against Ford set forth in the accompanying claim charts. As you likely know, many of your allegations relate to Ford's suppliers' technology and systems and it is those suppliers that would be in the best position to evaluate AutoConnect's license offer. Because of that, we recommend AutoConnect reach out to Ford's suppliers to discuss the allegations and provide them the opportunity to evaluate this license offer. That said, to the extent we understand AutoConnect's allegations, we have independently analyzed your patents and claim charts, and believe your infringement allegations fail for at least the following reasons.

For example, you allege Ford vehicles having the "Apple CarPlay/Android Auto" feature infringe several of your patents (*e.g.*, U.S. Patent Nos. 9,020,491, 9,140,560, 10,862,764, and 9,116,786). But, after reviewing your claim charts and investigating how Ford vehicles operate, Ford vehicles do not determine ***load*** (U.S. Patent No. 9,020,491), determine ***cloud services*** connected to the device (U.S. Patent No. 9,140,560), use ***computing capability*** of the device (U.S. Patent No. 10,862,764), or alter a ***setting*** (U.S. Patent No. 9,116,786), as required by the various claims recited in these patents.

Your allegations against Ford vehicles having the "Phone as a Key" feature are similarly flawed. With respect to U.S. Patent No. 9,123,186, your allegations fail to show how Ford vehicles determine that a ***vehicle occupant*** has been authenticated, determine an area and/or zone occupied by the ***vehicle occupant***, and apply rules based upon the determination of an area and/or zone

occupied by the ***vehicle occupant*** as recited in claim 1. Our analysis determined that Ford vehicles do not perform those steps and your claim charts do not show otherwise.

Regarding U.S. Patent No. 9,147,296, your infringement allegations fail because Ford vehicles do not determine a location inside a vehicle associated with a ***user***, determine a ***presence of the user*** inside the vehicle, or provide an adjustment output to a vehicle control system based on determining the ***user is present*** in the location inside the vehicle, as recited in claim 1.

With respect to U.S. Patent No. 11,163,931, Ford vehicle systems do not comprise a first user computing device that ***receives a command*** to grant vehicle control permission for the vehicle to a second user computing device and ***transmits***, to the ***server*** system, such ***command***, as required by claim 1. Ford vehicle systems also do not comprise a server system that ***transmits*** to the ***vehicle*** the ***updated vehicle profile data***, as recited in claim 1.

As to U.S. Patent No. 9,147,297, your allegations relate to the Ford vehicles' infotainment system. Based on our review of your claim charts and investigating how Ford vehicles operate, Ford vehicles do not (1) ***compare*** the access priority of the second user with the access priority of the first user, (2) allow adjustment when the access priority of the first user is ***greater than*** the access priority of the second user, or (3) prevent adjustment when the access priority of the first user is ***less than*** the access priority of the second user, as recited in claim 1.

With respect to U.S. Patent No. 9,147,298, where you are accusing Ford vehicles with "Predictive Destinations" feature of infringing, Ford vehicles do not ***plan a next route*** using pattern information based on the identified pattern and information from the user profile, as recited in claim 1. Nor do we see how that claim element is shown in your claim charts.

And finally, as to your allegations related to U.S. Patent No. 9,082,239, which allege that Ford vehicles having the "Intelligent Suggestion" and/or "Google Built-In" features infringe, Ford vehicles do not determine a type of assistance to provide a selected vehicle occupant where the type of assistance is ***not based on*** or ***in response to a preceding request*** of the selected vehicle occupant.

With respect to the second set of patents that your letter identifies as "appear[ing] to be infringed by Ford vehicles," AutoConnect fails to sufficiently show how Ford vehicles infringe any of those patents. In fact, none of your claim charts demonstrates how Ford vehicles infringe each and every limitation recited in the claims of those patents. Your claim charts rely on nothing more than third-party documents and information untethered to any Ford vehicle. Contrary to your unsubstantiated belief, Ford vehicles do not infringe those patents and Ford reserves the right to rebut any allegations of infringement once AutoConnect provides a reasonable basis for such belief.

The foregoing are examples of how Ford vehicles do not infringe any of AutoConnect's patents. As noted above, Ford's investigation is necessarily limited because AutoConnect's patents are directed to technology we purchase from suppliers. To the extent AutoConnect wishes to have deeper technology discussions for any patent, it may be beneficial to include Ford's suppliers in those discussions. Indeed, our suppliers are the better party to evaluate your allegations.

We are open to further discussions but at this point Ford does not believe it requires a license to any of the AutoConnect patents. We have endeavored to provide you sufficient explanation of the reasons for our conclusions based on the information available to Ford, but if there is additional information you would like us to consider, please let us know. This letter should not be construed as a waiver of any theory of non-infringement, invalidity, or unenforceability.

Regards,

Charles J. Monterio, Jr.