

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TOYOTA MOTOR CORP,
Petitioner,
v.

AUTOCONNECT HOLDINGS LLC,
Patent Owner.

PGR2025-00041
Patent 12,039,243

**AUTOCONNECT HOLDINGS LLC’S MOTION FOR *PRO HAC VICE*
ADMISSION OF WILLIAM R. WOODFORD
PURSUANT TO 37 C.F.R. § 42.10(c)**

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10(c), and as authorized in the Board's Notice of Filing Date issued May 12, 2025 (Paper 4), Patent Owner, AutoConnect Holdings LLC, respectfully requests that the Board admit William R. Woodford *pro hac vice* in this proceeding. Patent Owners conferred with Petitioner, and Petitioner confirmed that it does not oppose this Motion.

II. GOVERNING LAWS, RULES, AND PRECEDENT

In accordance with 37 C.F.R. § 42.10(c), the Board may recognize counsel *pro hac vice* during a proceeding upon showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. The Board has stated that motions for *pro hac vice* admission must be filed in accordance with the "Order -- Authorizing Motion for Pro Hac Vice Admission" entered in Case IPR2013-00639 (Paper 7). The Order requires that such motions (1) be filed no sooner than twenty-one days after service of the petition, (2) "[c]ontain a statement of facts showing there is good cause for the Board to recognize counsel *pro hac vice* during the proceeding," and (3) "[b]e accompanied by an affidavit or declaration of the individual seeking to appear."

III. STATEMENT OF FACTS SHOWING GOOD CAUSE FOR THE BOARD TO RECOGNIZE COUNSEL PRO HAC VICE DURING THE PROCEEDING

The facts here establish good cause for the Board to recognize William R. Woodford *pro hac vice* during this proceeding:

1. Lead counsel, Eric A. Zelepugas, is a registered practitioner (Reg. No. 73,302).

2. The Petition in this case was filed on April 7, 2025, more than twenty-one days ago.

3. Counsel, William R. Woodford, is an experienced patent litigator and has established familiarity with the subject matter at issue in the proceeding.

Accompanying this motion is the Declaration of William R. Woodford in Support of this Motion for Admission of Pro Hac Vice Admission of William R. Woodford (“Woodford Decl.”). In his declaration, Mr. Woodford attests that he is a member in good standing of the Bar of the State of Minnesota, and is also permitted to practice in the United States District Court for the District of Minnesota, the District of Colorado, the Western District of Wisconsin, the United States of Appeals for the Federal Circuit, the Eighth Circuit and the Supreme Court of the United States. Woodford Decl. ¶ 4.

4. Mr. Woodford is a Partner and Founder of Avantech Law LLP. Woodford Decl. ¶ 1. Mr. Woodford is an experienced litigating attorney. He has over 20 years of patent litigation experience. Woodford Decl. ¶ 3. Mr. Woodford has been a litigator in numerous patent infringement cases in federal courts across the United States. Woodford Decl. ¶ 3.

5. Mr. Woodford also attests that he is familiar with the subject matter and

patent at issue in this proceeding. He is counsel for AutoConnect Holdings LLC in two related matters asserting claims for infringement of the patent at issue in this proceeding. The matters are *AutoConnect Holdings LLC v. Toyota Motor Corporation, et al.*, Case No. 2:24-cv-00802 (Eastern District of Texas) and *AutoConnect Holdings LLC v. General Motors LLC*, Case No. 2:24-cv-877 (Eastern District of Texas). Woodford Decl. ¶ 6.

6. Mr. Woodford has never been suspended or disbarred from practice before any court or administrative body. Woodford Decl. ¶ 7.

7. No application of Mr. Woodford for admission to practice before any court or administrative body has ever been denied. ¶ 7.

8. No sanctions or contempt citations have been imposed against Mr. Woodford by a court or administrative body. Woodford Decl. ¶ 8.

9. Mr. Woodford has read and will comply with the Office Patent Trial Practice Guide (84 Fed. Reg. 64,280 (Nov. 21, 2019)) and the Board's Rules of Practice for Trials, as set forth in Part 42 of 37 C.F.R. Woodford Decl. ¶ 9.

10. Mr. Woodford agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.101 et seq. and disciplinary jurisdiction under 37 C.F.R. § 11.19(a). Woodford Decl. ¶ 10.

11. Mr. Woodford has not requested pro hac vice admission to appear in any proceedings before the Office within the last three years.

12. Counsel for Petitioner does not oppose to Mr. Woodford appearing pro hac vice during this proceeding.

IV. CONCLUSION

The Declaration in Support of Motion for Pro Hac Vice admission of William R. Woodford Pursuant to 37 C.F.R. § 42.10(c) is attached as Exhibit 2018. The requirements for admission pro hac vice being hereby established, Patent Owner respectfully request that the Board admit William R. Woodford pro hac vice as back-up counsel in this proceeding.

Dated: November 17, 2025

Respectfully Submitted,
AVANTECH LAW, LLP
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/Eric A. Zelepugas/
Eric. A. Zelepugas
USPTO Registration No. 73,302
Counsel for Patent Owner

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing **PATENT OWNER’S
MOTION FOR *PRO HAC VICE* ADMISSION OF WILLIAM R.
WOODFORD PURSUANT TO 37 C.F.R. § 42.10(c) and DECLARATION OF
WILLIAM R. WOODFORD IN SUPPORT OF AUTOCONNECT
HOLDINGS LLC’S MOTION FOR PRO HAC VICE ADMISSION OF
WILLIAM R. WOODFORD PURSUANT TO 37 C.F.R. § 42.10(c)** was served
electronically via e-mail on November 17, 2025, in its entirety on the following
counsel of record for Petitioner:

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