

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

**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)**

Mail Stop "PATENT BOARD"

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

This declaration is given in support of AutoConnect Holdings LLC's Motion for *Pro Hac Vice* Admission of William R. Woodford.

1. I am a Partner and Founder at the law firm of Avantech Law, LLP.
2. I have been practicing patent litigation since 2002 at intellectual property law firms. I have handled numerous patent litigations in federal district court, numerous appeals, and am well acquainted with the laws governing patentability.
3. I am admitted to practice in the State of Minnesota (Bar No. 0322593) and the Commonwealth of Massachusetts (Bar No. 708018), and I am a member in good standing in both jurisdictions. I am also admitted to practice before the Supreme Court of the United States, the United States of Appeals for the Federal Circuit and Eighth Circuit, as well as the United States District Courts for the District of Minnesota, the District of Colorado, and the Western District of Wisconsin. I am in good standing in all of these federal courts.
4. I have read and understand the pleadings submitted by Patent Owner and Petitioner in this proceeding. I have reviewed in detail U.S. Patent 12,039,243, which is the patent challenged in this proceeding. I have also reviewed the Exhibits submitted in this proceeding.
5. I am counsel for AutoConnect Holdings LLC in two related litigations in United States District Court involving U.S. Patent No. 12,039,243, including

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).

6. I have never been suspended or disbarred from practice before any court or administrative body. I have never been denied admission to practice before any court or administrative body.

7. I have never been subject to sanctions or contempt citations from any court or administrative body.

8. I have 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.

9. I understand that I will 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).

10. I have not requested pro hac admission to appear in any proceedings before the Office within the last three years.

11. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both,

under Section 1001 of Title 18 of the United States Code.

12. I executed this declaration on December 10, 2025, in Minneapolis,
Minnesota.

Dated: December 10, 2025

Respectfully Submitted,

/William R. Woodford/

William R. Woodford