

From: [Director_PTABDecision_Review](#)
To: [Andrew B. Turner](#); [Eric Zelepugas](#); [AutoConnect \(Post-Grant\)](#); FPGP0147IPR@brookskushman.com; FPGP0156IPR; FPGP0151IPR; FPGP0155IPR; FPGP0154IPR; FPGP0148IPR@brookskushman.com
Subject: RE: Ford v. AutoConnect - IPR2025-01342, IPR2025-01383, IPR2025-01524, IPR2026-00171, IPR2026-00172, and IPR2026-00173 - Petitioner Request for Authorization to file Additional Evidence - Denied
Date: Friday, April 10, 2026 10:02:00 AM
Attachments: [image001.png](#)

Counsel,

Petitioner's request for authorization to file additional evidence in support of its responses to Patent Owner's requests for Discretionary Denial and Director Review in the above-identified proceedings is denied.

Thanks.

IPR2025-01525
Ex. 3101

From: Andrew B. Turner <aturner@brookskushman.com>
Sent: Thursday, April 2, 2026 11:58 PM
To: Director_PTABDecision_Review <Director_PTABDecision_Review@uspto.gov>
Cc: Eric Zelepugas <zelepugas@avantechlaw.com>; AutoConnect (Post-Grant) <autoconnect_post-grant@avantechlaw.com>; FPGP0147IPR@brookskushman.com; FPGP0156IPR <FPGP0156IPR@brookskushman.com>; FPGP0151IPR <FPGP0151IPR@brookskushman.com>; FPGP0155IPR <FPGP0155IPR@brookskushman.com>; FPGP0154IPR <FPGP0154IPR@brookskushman.com>; FPGP0148IPR@brookskushman.com
Subject: Ford v. AutoConnect - IPR2025-01342, IPR2025-01383, IPR2025-01524, IPR2026-00171, IPR2026-00172, and IPR2026-00173 - Petitioner Request for Authorization to file Additional Evidence

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Dear Director,

Petitioner respectfully requests authorization to file additional evidence in support of its Responses to Patent Owner's Requests for Discretionary Denial in IPR2026-00171, IPR2026-00172, and IPR2026-00173, and its Responses to Patent Owner's Requests for Director Review in IPR2025-01342, IPR2025-01383, and IPR2025-01524.

Specifically, Petitioner requests authorization to file, as exhibits in the above listed proceedings, (1) its initial disclosure of claim terms for construction, and (2) the supplemental exhibits to its invalidity contentions, that were served today in the related district court litigation, *AutoConnect v. Holdings LLC v. Ford Motor Company*, Case No.1:24-01327-JCG (D. Del.)

This evidence is relevant and necessary to inform the Director that Petitioner has withdrawn

indefiniteness assertions in the related litigation with respect to the patents challenged in these IPRs.

Good cause exists for the request because the disclosure of claim terms and proposed constructions was due today pursuant to the district court scheduling order. (Ex. 1112, 28).

Respectfully Submitted,
Andrew Turner
Counsel for Petitioner

Andrew Turner

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