

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

AUTOCONNECT HOLDINGS LLC,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

Case No. 2:24-cv-1327-JCG

**AUTOCONNECT’S DISCLOSURE OF ASSERTED CLAIMS AND
INFRINGEMENT CONTENTIONS AGAINST FORD**

Pursuant to Paragraph 2 of the October 27, 2025 Scheduling Order (D.I. 27) in this matter, Plaintiff AutoConnect Holdings LLC (“AutoConnect”) hereby serves its Disclosure of Asserted Claims and Infringement Contentions against Defendant Ford Motor Company (“Ford”). AutoConnect has previously served its Document Production Accompanying Disclosure.

These disclosures are based on publicly available information that describes or discusses relevant features of the Accused Instrumentalities. AutoConnect’s investigation of relevant facts is ongoing. AutoConnect has not received any discovery from Ford, and the Court has not yet construed the claims. Further, important information about many or all of Ford’s Accused Instrumentalities and other products is not publicly available, including technical information relevant to the Asserted Patents and Accused Instrumentalities. Accordingly, AutoConnect reserves the right to modify and/or supplement these disclosures as information becomes available, such as based on new information learned through discovery, the Court’s claim construction rulings, and/or positions taken by Ford.

I. IDENTIFICATION OF ASSERTED CLAIMS¹

AutoConnect asserts U.S. Patent No. 9,020,491 (“the ’491 patent”), U.S. Patent No. 9,020,697 (“the ’697 patent”), U.S. Patent No. 9,082,239 (“the ’239 patent”), U.S. Patent No. 9,098,367 (“the ’367 patent”), U.S. Patent No. 9,116,786 (“the ’786 patent”), U.S. Patent No. 9,123,186 (“the ’186 patent”), U.S. Patent No. 9,140,560 (“the ’560 patent”), U.S. Patent No. 9,147,296 (“the ’296 patent”), U.S. Patent No. 9,147,297 (“the ’297 patent”), U.S. Patent No. 9,173,100 (“the ’100 patent”), U.S. Patent No. 9,290,153 (“the ’153 patent”), U.S. Patent No. 10,862,764 (“the ’764 patent”), and U.S. Patent No. 11,163,931 (“the ’931 patent”) (collectively, the “Asserted Patents”) against Ford. AutoConnect contends that Ford infringes the following Asserted Claims of the Asserted Patents based on its activities (as described herein) related to the Accused Instrumentalities:

Asserted Patents	Asserted Claims
’491 Patent	Claims 11, 12, 13, 14, 15, and 16 (the “’491 Asserted Claims”)
’697 Patent	Claims 1, 3, 4, 5, 8, 11, 12, 15, 18, 19 (the “’697 Asserted Claims”)
’239 Patent	Claims 1, 2, 5, 7, 8, 9, 12, 15, 16, 19, 21, 22, 29, 31, 33, and 35 (the “’239 Asserted Claims”)
’367 Patent	Claims 1, 2, 3, 8, 9, 10, 11, 12, 15, 16, 17, 18, 19, 22, 23, 24, 27, 28, 29, and 30 (the “’367 Asserted Claims”)
’786 Patent	Claims 1, 2, 7, 8, 9, 11, 23, and 24 (the “’786 Asserted Claims”)
’186 Patent	Claims 1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, 20 (the “’186 Asserted Claims”)
’560 Patent	Claims 11, 12, 13, 15, and 16 (the “’560 Asserted Claims”)
’296 Patent	Claims 1, 3, 4, 6, 7, 8, 9, 11, 13, 14, 15, 17, 19, 20 (the “’296 Asserted Claims”)

¹ D.I. 27, ¶ 2(a).

Asserted Patents	Asserted Claims
'297 Patent	Claims 1, 4, 5, 6, 7, 8, 9, 12, 13, 14, 15, 17, 18, 19, and 20 (the "'297 Asserted Claims")
'100 Patent	Claims 1, 2, 3, 7, 9, 10, 11, 15, 17, 18, 19, and 23 (the "'100 Asserted Claims")
'153 Patent	Claims 1, 2, 3, 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 18, 19, 20, 21 (the "'153 Asserted Claims")
'764 Patent	Claims 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 17, 18, 19, and 20 (the "'764 Asserted Claims")
'931 patent	Claims 1, 2, 3 (the "'931 Asserted Claims")

II. IDENTIFICATION OF ACCUSED INSTRUMENTALITIES²

The Accused Instrumentalities include at least the following, as well as instrumentalities with reasonably similar functionality (collectively, the "Accused Instrumentalities").

AutoConnect's identification of the Accused Instrumentalities is based on information reasonably available at this time. AutoConnect reserves the right to amend and/or supplement its identification of the Accused Instrumentalities as new information becomes available through discovery, additional factual investigation, the Court's claim construction rulings, or other relevant circumstances. AutoConnect further reserves the right to amend and/or supplement its identification of Accused Instrumentalities to add newly released products or other equivalent or infringing products ascertained through discovery. Further, if any Accused Instrumentalities have gone through or do go through name changes, but were or will be manufactured, used, offered for sale, sold, or imported with the same accused features or similar features, such products are also

² D.I. 27, ¶ 2(b).

accused. The identified Accused Instrumentalities include all trims and/or versions of the listed vehicles.

Asserted Claims	Accused Instrumentalities
'491 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit A1 (the "'491 Accused Instrumentalities").
'697 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Ford's Phone As A Key feature, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit B1 (the "'697 Accused Instrumentalities").
'239 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems and infotainment systems, in-vehicle multimedia systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Ford Digital Experience or Lincoln Digital Experience (including Android Auto) in Ford vehicles, in the makes and models from the 2024 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit C1 (the "'239A Accused Instrumentalities").
	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems and infotainment systems, in-vehicle multimedia systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Ford Intelligent Suggestions in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-

Asserted Claims	Accused Instrumentalities
	released vehicles with reasonably similar functionality, including those listed in Exhibit C3 (the “’239B Accused Instrumentalities”).
’367 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software and computer readable media that store computer that enable the Ford Digital Experience or the Lincoln Digital Experience in Ford vehicles, in the makes and models from the 2024 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit D1 (the “’367 Accused Instrumentalities”).
’786 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems) and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit E1 (the “’786 Accused Instrumentalities”).
’186 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Ford’s Phone As A Key feature, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit F1 (the “’186 Accused Instrumentalities”).
’560 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems (including in-vehicle multimedia and infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality,

Asserted Claims	Accused Instrumentalities
	including those listed in Exhibit G1 (the “560 Accused Instrumentalities”).
’296 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer-readable media that store computer-executable instructions and hardware and software that enable Personal Profiles with Phone As A Key in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit H1 (the “296 Accused Instrumentalities”).
’297 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable connection of multiple user devices in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit I1 (the “297 Accused Instrumentalities”).
’100 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems, in-vehicle multimedia and infotainment systems, and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable security measures in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit J1 (the “100 Accused Instrumentalities”).
’153 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems (including in-vehicle multimedia and infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit K1 (the “153A Accused Instrumentalities”).

Asserted Claims	Accused Instrumentalities
	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), mobile applications (including the Ford and Lincoln Apps), and hardware and software components thereof, including non-transitory computer readable media that stores microprocessor-executable instructions and hardware and software components that enable Ford’s Phone As A Key feature in Ford vehicles, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit K3 (the “153B Accused Instrumentalities”).
’764 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle communication systems (including in-vehicle multimedia and infotainment systems), and hardware and software components thereof, including non-transitory computer readable media that store computer-executable instructions and hardware and software that enable Apple CarPlay and/or Android Auto in Ford vehicles, in the makes and models from the 2017 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit L1 (the “764 Accused Instrumentalities”).
’931 Asserted Claims	All Ford vehicles (including Lincoln brand vehicles), vehicle systems (including in-vehicle multimedia and infotainment systems), server systems, mobile applications (including the Ford and Lincoln Apps), computing devices that execute the Ford and Lincoln Apps, and hardware and software components thereof, including non-tangible computer-readable media that stores microprocessor-executable instructions and in-vehicle hardware and software components that enable Ford’s Phone As A Key feature, in the makes and models from the 2020 model year to the present and any yet-to-be-released vehicles with reasonably similar functionality, including those listed in Exhibit M1 (the “931 Accused Instrumentalities”).

Ford either knew or should have known that the acts of such third parties directly infringed/infringe the '931 patent (or would have infringed if those acts occurred within the United States).

5. '931 Willful Infringement

Ford's infringement of the '931 patent has been and continues to be willful and merits enhanced damages. For example, Ford has known of the '931 patent and its infringement of the '931 patent as described herein and in AutoConnect's Complaint. On information and belief, since knowing of the '931 patent and its infringement thereof, Ford has not taken any affirmative steps to avoid infringing the '931 patent. On information and belief, Ford has made no attempt to design around the claims of the '931 patent. On information and belief, Ford has no reasonable basis for believing that the claims of the '931 patent are either invalid or not infringed by the '931 Accused Instrumentalities and/or or its activities concerning the '931 Accused Instrumentalities. AutoConnect has been damaged as the result of Ford's willful infringement.

IV. PRIORITY DATES⁴

For each Asserted Patent that claims priority to an earlier application, the table below identifies the earliest priority date to which each Asserted Claim is presently alleged to be entitled, based on the information currently available:

Asserted Claims	Priority Date
'491 All Asserted Claims	11/16/2011
'697 Asserted Claims 1, 3, 8, 11, 12, 15	10/15/2013
'697 Asserted Claims 4-5, 18, 19	01/13/2014
'239 All Asserted Claims	04/15/2014
'367 All Asserted Claims	08/09/2013

⁴ D.I. 27, ¶ 2(f).

'786 Asserted Claims 1, 9, 11	10/15/2012
'786 Asserted Claims 2, 7-8, 23, 24	03/14/2013
'186 Asserted Claims 1-4, 6, 8-11, 13, 15, 18, 20	04/15/2013
'186 Asserted Claims 7, 12, 14, 19	01/13/2014
'560 All Asserted Claims	11/16/2011
'296 Asserted Claims 1, 3, 4, 6-11, 13	04/15/2013
'296 Asserted Claims 14, 15, 17, 19, 20	04/15/2014
'297 All Asserted Claims	04/15/2013
'100 All Asserted Claims	10/18/2012
'153 Asserted Claims 1-4, 11-15	10/15/2013
'153 Asserted Claims 7-10, 18-21	01/13/2014
'764 All Asserted Claims	11/16/2011
'931 All Asserted Claims	04/15/2014

The above-listed priority dates are based on information reasonably available to AutoConnect at this time. AutoConnect reserves the right to supplement or amend these priority contentions based on information developed during this litigation, including through discovery or additional factual investigation. Such information may bear on whether the Asserted Claims are entitled to earlier priority or effective filing dates.

V. AUTOCONNECT PRACTICING PRODUCTS⁵

AutoConnect does not presently assert that its own apparatus, product, device, process, method, act, or other instrumentality practices the Asserted Claims of the Asserted Patents.

⁵ D.I. 27, ¶ 2(g).

VI. PRE-FILING DISCUSSIONS, PUBLIC USES, SALES OR OFFERS TO SELL⁶

Based on its reasonable search and investigation, AutoConnect states that it does not have any documents that fall within this category.

VII. CONCEPTION, REDUCTION TO PRACTICE, DESIGN, AND DEVELOPMENT⁷

Based on its reasonable search and investigation, AutoConnect states that it does not have any documents that fall within this category.

VIII. PATENTS AND FILE HISTORIES⁸

Copies of the AutoConnect patents and file histories have been produced at Bates Nos. ACFORD00000001-ACFORD00056926.

IX. OWNERSHIP DOCUMENTS⁹

Copies of the relevant ownership documents have been produced at Bates Nos. ACFORD00112806-ACFORD00128471.

X. AGREEMENTS TRANSFERRING AN INTEREST IN ASSERTED PATENTS¹⁰

Copies of the agreements transferring an interest in the Asserted Patents have been produced at Bates Nos. ACFORD00195605-ACFORD00195874.

XI. AGREEMENTS RELEVANT TO THE HYPOTHETICAL NEGOTIATION OR PLAINTIFF'S DAMAGES CASE¹¹

Based on its reasonable search and investigation, AutoConnect states that it is not presently aware of any documents that fall within this category. AutoConnect has not yet taken discovery

⁶ D.I. 27, ¶ 3(a).

⁷ D.I. 27, ¶ 3(b).

⁸ D.I. 27, ¶ 3(c).

⁹ D.I. 27, ¶ 3(d).

¹⁰ D.I. 27, ¶ 3(f).

¹¹ D.I. 27, ¶¶ 3(g)-(h).

in this action and therefore does not presently have access to Ford's internal licensing agreements, third-party agreements, settlement agreements, or other materials that may be relevant to damages or comparability. AutoConnect further has not yet completed expert discovery or damages analysis. AutoConnect therefore reserves the right to amend or supplement this disclosure to identify agreements that are comparable to a license resulting from a hypothetical reasonable royalty negotiation, or that otherwise may be used to support AutoConnect's damages case, as discovery proceeds and expert analysis is completed.

XII. PARAGRAPHS 3(e), (i), AND (j)¹²

Based on its reasonable search and investigation, AutoConnect states that it does not have any documents that fall within these categories.

¹² D.I. 27, ¶¶ 3(e), (i), (j).

Dated: December 19, 2025

By: /s/William R. Woodford

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CERTIFICATE OF SERVICE

This is to certify that on December 19, 2025, a true and correct copy of AutoConnect's Disclosure of Asserted Claims and Infringement Contentions Against Ford was served by electronic mail to counsel of record for Defendant Ford Motor Company.

/s/ Sallee N. Counce

Sallee N. Counce, Paralegal