

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE NEO WIRELESS, LLC
PATENT LITIG.

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2:22-md-03034-TGB

HON. TERRENCE G. BERG

NEO WIRELESS, LLC,

Plaintiff,

v.

FORD MOTOR COMPANY,

Defendant.

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2:22-cv-11402-TGB

HON. TERRENCE G. BERG

JURY TRIAL DEMANDED

**NEO WIRELESS LLC’S ANSWER TO FORD MOTOR COMPANY’S
COUNTERCLAIMS**

Plaintiff/Counter-Defendant Neo Wireless LLC (“Neo”) hereby submits its Answer to Defendant/Cross-Plaintiff Ford Motor Company (“Ford”)’s Counterclaims filed December 16, 2022, on information, knowledge and belief as follows:

BACKGROUND¹

1. Admitted.

¹ Neo reproduces the headlines of Ford’s Counterclaims as they appear in that filing solely for convenience. To the extent that any of the headlines can be construed as allegations, they are denied.

2. Admitted.

3. Paragraph 3 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

PARTIES

4. Admitted.

5. Admitted.

JURISDICTION AND VENUE

6. Paragraph 6 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

7. Paragraph 7 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

COUNT ONE: DECLARATORY JUDGMENT OF NON-INFRINGEMENT OF THE '366 PATENT

8. Paragraph 8 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

9. Admitted.

10. Paragraph 10 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

11. Paragraph 11 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

12. Paragraph 12 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

**COUNT TWO: DECLARATORY JUDGMENT OF NON-INFRINGEMENT
OF THE '908 PATENT**

13. Paragraph 13 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

14. Admitted.

15. Paragraph 15 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

16. Paragraph 16 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

17. Paragraph 17 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

**COUNT THREE: DECLARATORY JUDGMENT OF NON-
INFRINGEMENT OF THE '941 PATENT**

18. Paragraph 18 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

19. Admitted.

20. Paragraph 20 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

21. Paragraph 21 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

22. Paragraph 22 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

**COUNT FOUR: DECLARATORY JUDGMENT OF NON-
INFRINGEMENT OF THE '450 PATENT**

23. Paragraph 23 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

24. Admitted.

25. Paragraph 25 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

26. Paragraph 26 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

27. Paragraph 27 contains legal conclusions to which no response is required. To the extent a response is required, Neo denies any remaining allegations.

**COUNT FIVE: DECLARATORY JUDGMENT OF NON-INFRINGEMENT
OF THE '512 PATENT**



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