

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

IN RE NEO WIRELESS, LLC
PATENT LITIG.

2:22-MD-03034-TGB
HON. TERRENCE G. BERG
JURY TRIAL DEMANDED

**PLAINTIFF NEO WIRELESS LLC’S UNOPPOSED MOTION FOR
ISSUANCE OF LETTERS OF REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE IN PROCURING EVIDENCE FROM FOREIGN
THIRD PARTIES**

Plaintiff Neo Wireless, LLC (“Neo”) respectfully requests, pursuant to 28 U.S.C. § 1781 and Federal Rules of Civil Procedure 26(b)(1) and 28(b), that the Court issue Letters of Request seeking, pursuant to the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters (“Hague Evidence Convention”), the procurement of evidence from foreign third parties Ficosa International S.A. (“Ficosa”), Quectel Wireless Solutions Ltd. (“Quectel”), and Rolling Wireless S.A.R.L. (“Rolling”). These foreign third parties possess documents and knowledge to be used at trial in support of Plaintiff’s infringement allegations against Defendants. Counsel for the affected Defendants¹ do not oppose this Motion. Specifically, Plaintiff respectfully requests that the Court sign and

¹ The third party recipients are either, on information and belief, direct or indirect suppliers to FCA US LLC, Nissan North America, Inc., Nissan Motor Acceptance Corp., and Tesla, Inc.

affix its seal to the accompanying Letters of Request (attached as Appendices A–C) and return the same with original signatures and seals to Plaintiff’s counsel for transmission to the central judicial authorities via the U.S. Department of State.

DATED: May 9, 2023

Respectfully submitted,

/s/ Christopher S. Stewart

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned certifies that on May 9, 2023, the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Christopher S. Stewart
Christopher S. Stewart

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IN RE NEO WIRELESS, LLC
PATENT LITIG.

2:22-MD-03034-TGB
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JURY TRIAL DEMANDED

**BRIEF IN SUPPORT OF PLAINTIFF NEO WIRELESS LLC'S
UNOPPOSED MOTION FOR ISSUANCE OF LETTERS OF REQUEST
FOR INTERNATIONAL JUDICIAL ASSISTANCE IN PROCURING
EVIDENCE FROM FOREIGN THIRD PARTIES**

STATEMENT OF THE ISSUE PRESENTED

Whether the Court should issue Letters of Request seeking assistance from the appropriate central judicial authorities of China, Luxembourg, and Spain in obtaining discovery from third parties.

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