

**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

NEO WIRELESS, LLC,  
*Plaintiff,*

2:22-CV-11769-TGB

v.

MERCEDES-BENZ USA, LLC,  
*Defendant.*

HON. TERRENCE G. BERG

**JOINT NOTICE OF SETTLEMENT AND REQUEST FOR STAY**

Plaintiff Neo Wireless, LLC (“Neo”) and Defendant Mercedes-Benz USA, LLC (“MBUSA”) hereby notify the Court that they have reached a definitive agreement regarding settlement.

The parties respectfully request that all proceedings in the member case *Neo Wireless, LLC v. Mercedes-Benz USA, LLC*, No. 2:22-cv-11769-TGB be stayed for 30 days from today (through July 6, 2023) while the final details of the settlement, including payment, are completed. As soon as the settlement is fully concluded, the parties will jointly file a motion to dismiss the case as to MBUSA. For avoidance of doubt, both this request for a stay and the pending settlement agreement pertain

solely to the dispute between Neo and MBUSA, and all other actions in this MDL are unaffected by the same.

DATED: June 6, 2023

Respectfully submitted,

/s/ Christopher S. Stewart

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on June 6, 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