

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

IN RE NEO WIRELESS LLC
PATENT LITIGATION

2:22-MD-03034-TGB

HON. TERRENCE G. BERG

JURY TRIAL DEMANDED

**PLAINTIFF’S UNOPPOSED MOTION FOR ISSUANCE OF LETTER OF
REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE IN
PROCURING EVIDENCE FROM FOREIGN THIRD PARTY**

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 a Letter 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-party LG Electronics, Inc. (“LG”). LG possesses 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 affix its seal to the accompanying Letter of Request (attached as Appendix A) and return the same with original

¹ Neo seeks to obtain from LG information regarding components incorporated into various GM, Honda, Toyota, and Volkswagen vehicles; counsel for these Defendants do not oppose this Motion.

signatures and seals to Plaintiff's counsel for transmission to the central judicial authorities via the U.S. Department of State.

DATED: August 15, 2023

Respectfully submitted,

/s/ Christopher S. Stewart
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**ATTORNEYS FOR PLAINTIFF
NEO WIRELESS LLC**

CERTIFICATE OF SERVICE

I certify that counsel of record is being served with a copy of the foregoing document via the Court's CM/ECF system on August 15, 2023.

/s/ Christopher S. Stewart
Christopher S. Stewart

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FOR THE EASTERN DISTRICT OF MICHIGAN
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IN RE NEO WIRELESS, LLC
PATENT LITIG.

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

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

STATEMENT OF THE ISSUE PRESENTED

Whether the Court should issue a Letter of Request seeking assistance from the appropriate central judicial authorities of South Korea in obtaining discovery from a third party.

Plaintiff's position: Yes.

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