

# EXHIBIT C

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

In Re: Neo Wireless, LLC  
Patent Litigation

No. 2:22-md-03034-TGB

Hon. Terrence G. Berg

JURY TRIAL DEMANDED

**PLAINTIFF NEO WIRELESS LLC'S RESPONSES & OBJECTIONS TO  
DEFENDANTS' FIRST SET OF COMMON REQUESTS FOR  
PRODUCTION OF DOCUMENTS & THINGS (NOS. 1–50)**

Pursuant to Rules 26 & 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Eastern District of Michigan, Plaintiff Neo Wireless LLC serves the following responses and objections to Defendants Volkswagen Group of America Inc., Volkswagen Group of America Chattanooga Operations, LLC, Nissan North America Inc., Nissan Motor Acceptance Corporation, American Honda Motor Co., Inc., Honda Development & Manufacturing of America, LLC, Ford Motor Company, Toyota Motor North America, Inc., Toyota Motor Sales USA, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., Tesla, Inc., Mercedes-Benz USA, LLC, and General Motors (collectively “Defendants”)’ First Set of Common Requests for Production of Documents and Things (Nos. 1–50) dated August 10, 2022.

### **PRELIMINARY STATEMENT**

1. Plaintiff provides these Responses to Defendants in good faith based on its investigation to date. Plaintiff will continue its investigation, analysis, discovery, and legal research in this matter and accordingly reserves the right to rely on facts, documents, legal research, or other evidence that might come to its attention at a later time. Plaintiff sets forth these responses and objections without prejudice to its right to supplement or amend them, or to assert additional objections should it discover additional information or grounds for objection. Plaintiff specifically reserves the right to supplement or amend these responses and objections at any time before trial.

2. By producing documents, Neo Wireless does not waive and specifically reserves its right to contest the admissibility or relevance of such documents. Any inadvertent disclosure and production of information that is not relevant or is subject to other objection(s) does not waive any objection to producing such documents or to producing additional or related documents. The presence of any objection to one of the Requests does not indicate that documents responsive thereto have been withheld, or will be withheld, from discovery. As to the Requests to which Plaintiff objects, Plaintiff is willing to discuss each such Request with Defendants' counsel to determine whether any or all of the objections can be satisfied, or the Requests can be clarified or narrowed. Plaintiff makes the following general objections to

Defendants' definitions, instructions, and document requests, whether or not the objections are also separately set forth in response to each definition, instruction, or document request.

3. Plaintiff's responses are made solely for the purposes of discovery in this Action. Nothing herein is intended to waive the following objections, which are expressly reserved including but not limited to the following objections: all objections as to competence, relevance, authenticity, propriety, materiality, and admissibility of the subject matter of the requests or documents produced in response thereto; all objections on any ground to any request for further responses to these or other discovery requests; and any and all other objections and grounds that would or could require or permit the exclusion of any information, document or statement therein from evidence, all of which objections and grounds are reserved and may be interposed at a hearing in this Action or at the time of trial.

4. Plaintiff incorporates each and every General Objection set forth below in each response to the individually numbered document requests as if they were set forth in each response. The failure to include any general objection in any specific response shall not be interpreted as a waiver of any general objection to the applicable Request.

5. No incidental or implied admissions are intended by responding to the Requests herein, nor by producing documents, communications, and/or things in

response to the Requests herein. The fact that Plaintiff has responded to, objected to, or produced documents responsive to any Request should not be taken as an admission that Plaintiff accepts or admits the existence of any purported “fact” set forth or assumed by any Request.

### **GENERAL OBJECTIONS**

1. Plaintiff objects to Defendants’ definitions, instructions, and requests to the extent that they purport to impose burdens or duties upon Plaintiffs that exceed the scope of reasonable, permissible, and proportional discovery or that exceed the requirements of the Federal Rules of Civil Procedure, the Local Rules of the Eastern District of Michigan, or any other applicable rule, decision, law, or court order.

2. Plaintiff objects to Defendants’ requests to the extent that they seek information protected by, immune from, or otherwise exempt from discovery by the attorney–client privilege, common-interest privilege, any other privilege, the work-product doctrine, any applicable state or federal statutes, the Federal Rules of Civil Procedure, the Local Rules of the Eastern District of Michigan, or any other applicable rule, decision, or law. The specific objections stated below on the grounds of attorney–client privilege and/or work-product doctrine in no way limit the applicability of this objection to all Requests. Nothing contained in the responses below is intended to be, nor should be considered, a waiver of any attorney–client privilege and/or work-product doctrine, right of privacy, or any other applicable

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