

**IN THE UNITED STATES DISTRICT COURT  
FOR THE 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  
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NEO WIRELESS, LLC,  
  
*Plaintiff,*

§  
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§ 2:22-cv-11406-TGB  
§  
§ HON. TERRENCE G. BERG

v.

TOYOTA MOTOR CORPORATION,  
TOYOTA MOTOR NORTH  
AMERICA, INC., TOYOTA MOTOR  
SALES, U.S.A., INC., & TOYOTA  
MOTOR ENGINEERING &  
MANUFACTURING NORTH  
AMERICA, INC., & TOYOTA  
MOTOR CREDIT CORPORATION,

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§ **JURY TRIAL DEMANDED**  
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*Defendants.*

**ORDER  
COMMISSION DIRECTING THE TAKING ABROAD OF VOLUNTARY  
ORAL DEPOSITIONS OF JAPANESE WITNESSES**

**TO: ANY COUNSUL OR VICE COUNSUL OF THE UNITED  
STATES, UNITED STATES CONSULATE OSAKA, JAPAN or UNITED  
STATES EMBASSY TOKYO, JAPAN:**

Upon the Application of Plaintiff Neo Wireless, LLC pursuant to Article 17 of the United States-Japan Consular Convention,

You have been duly appointed and you are hereby authorized to take the oral depositions at the United States Consulate in Osaka, Japan or the United States Embassy Tokyo, Japan, of the following witnesses who will appear voluntarily: Satoshi Hata, employee of Toyota Motor Corporation, 1 Toyota-Cho, Toyota City, Aichi Prefecture 471-8571, Japan.

The depositions are scheduled to commence on or about October 25, 2023 at 8:45 a.m. and terminate on or about October 26, 2023 at 4:00 p.m., and to mark any documentary exhibits in connection therewith.

Counsel for Defendants who will participate in the depositions in person at the United States Consulate is Matthew Satchwell. Counsel for Defendants who may participate in the depositions virtually via remote audio and/or videoconference are Paul Steadman, Brian Erickson, Dawn Jenkins, Shuzo Maruyama, Ankur Desai, Monica De Lazzari, Chris Katsantonis, and Farris Matariyeh.

Counsel for the Plaintiff who will participate in the depositions are Jason D. Cassady, Christopher S. Stewart, Daniel R. Pearson, Hamad M. Hamad, Bailey A. Blaies, James F. Smith, and James Yang. One of the aforementioned attorneys will participate in the depositions in-person at the United States Consulate, the

remainder, may participate in the depositions virtually via remote audio and/or videoconference.

The proceedings will be reported, videotaped and/or interpreted by Planet Depos – American Realtime Court Reporters: Mary Allred, Jade King, Charlotte Lacey, Mark McClure, Jason Meadors, Giselle Mitchell, and Kadi Harmon (reporters); Trevor Price, Scott Yuken, Christie Jeon, Jeremy Dineen, Linda Fleet, Wendy Viner, and Joe Viner (videographers); Jeremy Dineen, Scott Yuken, Christie Jeon, Linda Fleet, Wendy Viner, and Joe Viner (technicians); and Naoko Selland, Mike Sekine, Hanako Kaku, Tobias “Toby” Rushbrook, and Yoshiko Iga (interpreters). The proceedings will also be interpreted by Ai Miyake.

Please cause the testimony of said witnesses to be reduced to writing and the depositions signed by said witnesses and annex said deposition testimony your commission and close the same under your seal and make return thereof to this Court with all convenient speed.

**IT IS SO ORDERED.**

DATE: September 28, 2023

/s/Terrence G. Berg

Hon. Terrence G. Berg  
United States District Judge