

***Response to
Defendants' Motion to
Compel***

***Redacted Version of
Document to be Sealed
Pursuant to LR
5.3(b)(3)(B)(iii)***

**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

**PLAINTIFF NEO WIRELESS, LLC'S RESPONSE TO DEFENDANTS'
JOINT MOTION TO COMPEL PRODUCTION OF NEO'S LICENSING
NEGOTIATIONS WITH AVANCI**

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STATEMENTS OF ISSUES PRESENTED

1. Though Defendants have declined to withdraw their Motion, the dispute at the crux of Defendants’ Motion—the production of Neo’s “patent licensing negotiations with third-party Avanci, LLC” (Mot. at i)—is moot. The only issue that remains is whether Defendants are entitled to discover [REDACTED] [REDACTED] about the hypothetical terms and strategy around [REDACTED] of this litigation.

Answer: No.

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