

# *Exhibit B*

## *Redacted Version of Document to be Sealed*

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**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 THIRD SUPPLEMENTAL  
RESPONSES AND OBJECTIONS TO DEFENDANTS’ FIRST SET OF  
COMMON INTERROGATORIES (NO. 2)**

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 third supplemental 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 Interrogatories (Nos. 1–7) dated August 10, 2022.

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█ [REDACTED]

█ [REDACTED]

█ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**THIRD SUPPLEMENTAL RESPONSE:**

Subject to and without waiving the foregoing specific and general objections, and subject to the non-waiver agreements set forth in the Discovery/Protective Orders in the case and the Parties’ August 23<sup>rd</sup> and September 8<sup>th</sup> email exchanges, Plaintiff provides the following Third Supplemental Response:

For further detail on [REDACTED]

[REDACTED]

[REDACTED] [REDACTED] [REDACTED] [REDACTED]

[REDACTED] and email communications which will be produced when Defendants follow the required ESI procedures set forth in the Parties’ agreed Discovery Plan.

As previously stated, [REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

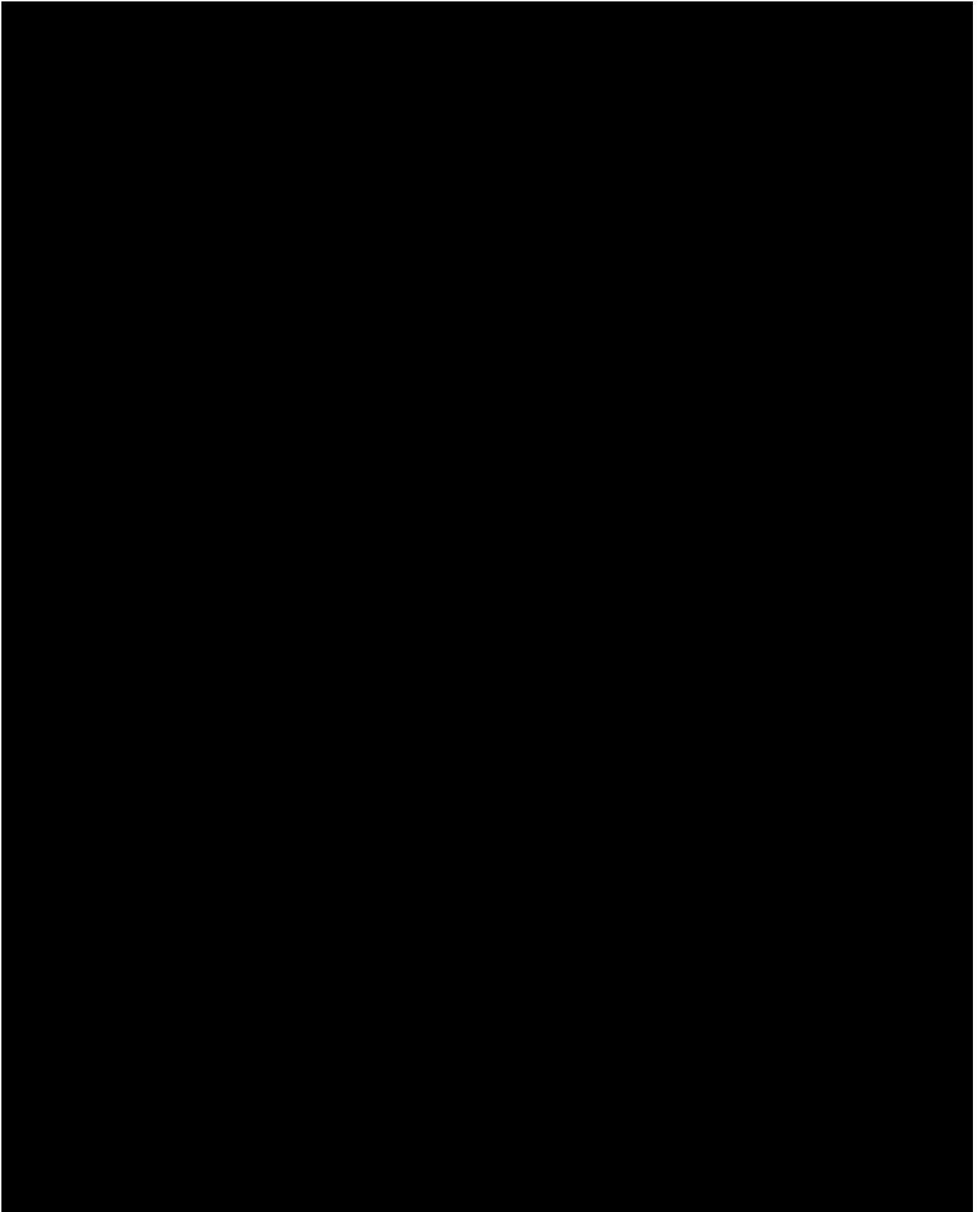
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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