

**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 LETTERS OF  
REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE IN  
PROCURING EVIDENCE FROM FOREIGN THIRD PARTIES**

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 Letters 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 parties LG Electronics, Inc. (“LG”) and LG Electronics Deutschland GmbH (“LGD”). LG and LGD possess documents and knowledge to be used at trial in support of Plaintiff’s infringement allegations against certain Defendants. Counsel for the Defendants to whom the requested discovery pertains<sup>1</sup> does not oppose this Motion. Specifically, Plaintiff respectfully requests that the Court sign and affix its seal to the accompanying Letters of Request (attached as Appendices A & B) and return the

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<sup>1</sup> Neo seeks to obtain from LG information regarding components incorporated into various Volkswagen vehicles; counsel for the Volkswagen Defendants does not oppose this Motion.

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

DATED: November 16, 2023

Respectfully submitted,

/s/ Jason D. Cassady

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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 CM/ECF system on November 16, 2023.

/s/ Jason D. Cassady  
Jason D. Cassady

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

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 LETTERS OF REQUEST  
FOR INTERNATIONAL JUDICIAL ASSISTANCE IN PROCURING  
EVIDENCE FROM FOREIGN THIRD PARTIES**

**STATEMENT OF THE ISSUE PRESENTED**

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

Plaintiff's position: Yes.

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