

**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 pertains¹ 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

¹ 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

Jason D. Cassady

Texas State Bar No. 24045625

Email: jcassady@caldwellcc.com

Christopher S. Stewart

Texas State Bar No. 24079399

Email: cstewart@caldwellcc.com

CALDWELL CASSADY CURRY P.C.

2121 N. Pearl St., Suite 1200

Dallas, Texas 75201

Telephone: (214) 888-4848

Facsimile: (214) 888-4849

Jaye Quadrozzi (P71646)

Email: quadrozzi@youngpc.com

YOUNG, GARCIA &

QUADROZZI, PC

2775 Stansbury Blvd., Suite 125

Farmington Hills, Michigan 48334

Telephone: (248) 353-8620

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.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.