

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

In Re: Neo Wireless, LLC, Patent Litigation	Case No. 2:22-md-03034-TGB Hon. Terrence G. Berg
Neo Wireless, LLC, v. Ford Motor Company	2:22-CV-11402-TGB
Neo Wireless, LLC, v. American Honda Motor Co., Inc., et al.	2:22-CV-11403-TGB
Neo Wireless, LLC, v. Volkswagen Group of America, Inc. et al.	2:22-CV-11404-TGB
Neo Wireless, LLC, v. Nissan North America Inc. et al.	2:22-CV-11405-TGB
Neo Wireless, LLC, v. Toyota Motor Corporation et al.	2:22-CV-11406-TGB
Neo Wireless, LLC, v. General Motors Company et al.	2:22-CV-11407-TGB
Neo Wireless, LLC, v. Tesla Inc.	2:22-CV-11408-TGB
Neo Wireless, LLC, v. FCA US LLC	2:22-CV-11770-TGB

**PLAINTIFF'S STATUS UPDATE OF *INTER PARTES* REVIEW
PROCEEDINGS**

Consistent with this Court's request at the November 28, 2022, status conference, Plaintiff Neo Wireless, LLC writes to respectfully notify the Court of the status of *inter partes* review proceedings that were filed on the asserted patents in this litigation.

On November 9, 2023, the Patent Trial and Appeal Board (“PTAB”) entered two decisions denying institution of inter partes review against two of the Asserted Patents: U.S. Pat. No. 10,447,450 (the “450 patent) and U.S. Pat. No. 10,771,302 (the “302 patent). *See Ford Motor Company v. Neo Wireless LLC*, IPR2023-00763, Paper 17 (PTAB Nov. 9, 2023), *American Honda Motor Co., Inc. v. Neo Wireless LLC*, IPR2023-00797, Paper 14 (PTAB Nov. 9, 2023). These proceedings were a basis of Defendants’ Motion to Stay. *See* Dkt. 145 at 2, 9-10, 14. The PTAB’s decisions denying institution in IPR2023-00763 and IPR2023-00797 are attached as Exhibits A and B to this Notice.

Below is an updated version of the summary chart Neo submitted on October 24, 2023 (Dkt. 194). As before, the instituted proceedings (with their duplicative proceedings) are shaded green, the denied petitions (with their duplicative proceedings) are shaded peach. As the chart demonstrates, of the eight substantively unique IPRs filed by Defendants, five have been rejected.

PTAB Case Number	Petitioner	Neo Wireless U.S. Patent No.	Institution Decision	Duplicative Petition(s)
IPR2022-01537	Volkswagen Group of America, Inc.	10,075,941	Instituted May 5, 2023	IPR2023-00766 (Ford) IPR2023-00791 (Honda) IPR2023-00964 (GM; Nissan; Tesla)

PTAB Case Number	Petitioner	Neo Wireless U.S. Patent No.	Institution Decision	Duplicative Petition(s)
IPR2022-01538	Volkswagen Group of America, Inc.	10,771,302	Denied May 5, 2023	
IPR2023-00797	American Honda Motor Co., Inc.	10,771,302	Denied Nov. 9, 2023	
IPR2022-01539	Volkswagen Group of America, Inc.	10,965,512	Instituted May 2, 2023	IPR2023-00079 (MBUSA - Resolved by Settlement) IPR2023-00764 (Ford) IPR2023-00961 (Honda; GM; Nissan; Tesla)
IPR2022-01567	Volkswagen Group of America, Inc.	10,447,450	Instituted May 4, 2023	IPR2023-00793 (Honda) IPR2023-00963 (GM; Nissan; Tesla)
IPR2023-00763	Ford	10,447,450	Denied Nov. 9, 2023	IPR2023-00962 (GM; Nissan)
IPR2023-00086	Volkswagen Group of America, Inc.	10,833,908	Denied June 16, 2023	IPR2023-00794 (Honda) IPR2023-00765 (Ford)
IPR2023-00426	Volkswagen Group of America, Inc.	8,467,366	Denied Sept. 26, 2023	IPR2023-00790 (Honda)

DATED: November 17, 2023

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF NEO
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CERTIFICATE OF SERVICE

The undersigned certifies that on November 17, 2023, the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

/s/ Jason D. Cassady

Jason D. Cassady