

**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
	§	
	§	
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NEO WIRELESS, LLC v.	§	2:22-CV-11404-TGB
VOLKSWAGEN GROUP OF	§	
AMERICA, INC., ET AL.	§	HON. TERRENCE G. BERG

**JOINT MOTION FOR STAY PENDING SETTLEMENT**

Pursuant to Federal Rule of Civil Procedure 16(b)(4), Plaintiff Neo Wireless, LCC and Defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC (“Volkswagen”) hereby jointly request a one month stay of all obligations and deadlines set out in the Court’s Scheduling Order (Dkt. 84), as to Volkswagen only.

Neo and Volkswagen have reached an agreement in principle to settle the case and resolve their dispute, and expect to jointly move to dismiss the case in short order. However, because of the holidays, the parties need additional time to fully finalize a formal settlement agreement. Thus, the parties request a one month stay to enable the parties to finalize the agreement, while avoiding burdening the Court or the parties with unnecessary discovery practice in the meantime. As soon

as the parties' formal settlement is finalized, the parties will shortly thereafter file a Joint Motion to Dismiss. If for some reason the parties cannot finalize the agreement by January 15<sup>th</sup>, counsel for the parties will request a conference with the Court and jointly propose an adjusted case schedule for Volkswagen only that does not disrupt the deadlines for any other Defendant or the deadlines for dispositive and *Daubert* motions currently set forth in the Scheduling Order.

Date: December 15, 2023

Respectfully submitted,

/s/Daniel E. Yonan

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***Attorneys for Plaintiff  
NEO WIRELESS, LLC***

**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 15, 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