

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

IN RE NEO WIRELESS, LLC
PATENT LITIG.

Case No. 2:22-md-03034-TGB
HON. TERRENCE G. BERG
JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR ENTRY OF STIPULATED
SUPPLEMENTAL PROTECTIVE ORDER**

Plaintiff Neo Wireless and Intel Corporation, a subpoenaed non-party to this action, by and through their respective counsel, hereby file this Unopposed Motion for Entry of a Stipulated Supplemental Protective Order. The Supplemental Protective Order relates to the confidential information of third-party Intel Corporation that will be produced in this action. As a compromise to avoid a dispute with the Court, and given the unique circumstances of Intel's relationship to this case and the small amount of discovery at issue, the relevant parties have agreed on the proposed order attached hereto as Exhibit A. Neo Wireless respectfully requests that the Court enter the proposed Stipulated Supplemental Protective Order as attached hereto. Defendant Tesla Inc. does not oppose this motion.

DATED: December 21, 2023

Respectfully submitted,

/s/ Megan Whyman Olesek

Megan Whyman Olesek
California Bar No. 191218
Email: olesek@turnerboyd.com
TURNER BOYD SERAPHINE LLP
155 Bovet Road, Suite 750
San Mateo, California 94402
Telephone: (650) 265-6109

Thomas W. Cranmer (P25252)
Email: cranmer@millercanfield.com
Miller, Canfield, Paddock and Stone,
P.L.C.

840 West Long Lake Road
Suite 150
Troy, Michigan 48098-6358
Telephone: (248) 267-3381

**COUNSEL FOR NON-PARTY
INTEL CORPORATION**

/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

The undersigned certifies that on December 21, 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