

**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
NEO WIRELESS, LLC	§ § § § § § § §	Case No. 2:22-cv-11403-TGB HON TERRENCE G. BERG <b>JURY TRIAL DEMANDED</b>
v.  AMERICAN HONDA MOTOR CO. INC. & HONDA DEVELOPMENT & MANUFACTURING OF AMERICA, LLC,		

**JOINT STIPULATION TO LIMITED EXTENSION  
OF FACT DISCOVERY DEADLINE**

Plaintiff Neo Wireless, LLC (“Neo”) and Defendants American Honda Motor Co. and Honda Development & Mfg. Co. of America, LLC (“Honda”) jointly stipulate, subject to the approval of the Court, to a limited-purpose extension of the fact discovery deadline. Specifically, the parties ask that the Court approve a two-day extension through January 31, 2024, for the purpose of facilitating the deposition of Daniel Tiet, one of Honda’s 30(b)(6) designees. Good cause exists in that the proposed extension is necessary to accommodate Mr. Tiet’s schedule and the large number of other depositions taking place during the month of January in the above-captioned multidistrict litigation. The parties’ proposed extension would only apply to the deposition of Mr. Tiet, and would therefore only affect the individual case captioned above.

DATED: January 4, 2024

Respectfully submitted,

/s/ Jason D. Cassady

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**ATTORNEYS FOR PLAINTIFF**

**NEO WIRELESS LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on January 4, 2024January 4, 2024, 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*

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Jason D. Cassady