

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

IN RE NEO WIRELESS, LLC	§	Case No. 2:22-md-03034-TGB
PATENT LITIG.	§	HON. TERRENCE G. BERG
	§	

NEO WIRELESS, LLC	§	
	§	
v.	§	Case No. 2:22-cv-11404-TGB
	§	HON TERRENCE G. BERG
VOLKSWAGEN GROUP OF AMERICA, INC.; VOLKSWAGEN GROUP OF AMERICA	§	JURY TRIAL DEMANDED
CHATTANOOGA OPERATIONS, LLC	§	
	§	

**JOINT MOTION TO DISMISS WITH
PREJUDICE PURSUANT TO RULE 41(a)(2)**

Plaintiff Neo Wireless, LLC and Defendants Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC hereby move, pursuant to Federal Rule of Civil procedure 41(a)(2), for an order dismissing all claims and counterclaims currently and previously pled in this case WITH PREJUDICE, with each party to bear its own costs, expenses, and attorney’s fees.

Accordingly, Neo and Volkswagen jointly move for dismissal pursuant to Rule 41(a)(2) under the terms listed above.

Date: January 8, 2024

Respectfully submitted,

/s/Daniel E. Yonan

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CERTIFICATE OF SERVICE

The undersigned certifies that on January 8, 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

Jason D. Cassady