

EXHIBIT 6

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

In Re: Neo Wireless, LLC Patent Litigation

Plaintiff

v.

Civil Action No. 2:22-md-03034-TGB

Defendant

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To: CFIP NCF Holdings LLC, c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange St, Wilmington, DE 19801

(Name of person to whom this subpoena is directed)

☒ **Production: YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See Attachment A.

Place: Elizabeth Ranks, Fish & Richardson P.C.,
1 Marina Park Drive, Boston, MA 02210, or at a location
that is mutually agreed upon by counsel.

Date and Time: July 13, 2023 at 5:00 pm ET

☐ **Inspection of Premises: YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 6/15/2023

KINIKIA D. ESSIX, CLERK OF COURT

OR

/s/ Elizabeth G.H. Ranks

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Tesla, Inc., who issues or requests this subpoena, are:

Elizabeth G.H. Ranks, Fish & Richardson P.C., 1 Marina Park Drive, Boston, MA 02210, ranks@fr.com, ph: 617- 542-5070

Notice to the person who issues or requests this subpoena

REQUEST FOR PRODUCTION NO. 18:

All agreements, assignments, or contracts between You and AT&T, Adaptix, Broadstorm Telecommunications, Inc., Waltical Solutions, Walbell Technologies, Inc., Neocific, Inc., and Neo Wireless.

REQUEST FOR PRODUCTION NO. 19:

All Documents and Communications relating to Your experience with and involvement in the IEEE, including but not limited to your involvement in the IEEE's efforts to develop the WiMAX standard.

REQUEST FOR PRODUCTION NO. 20:

All Documents, Communications, and Things referring or relating to the fixed wireless and/or broadband wireless access (BWA) system referred to as "Project Dino," "Project Angel," "AT&T Digital Broadband," "SymmetryOne," or "SymmetryMX," including without limitation research or laboratory notebooks, workbooks, or diaries; technical files, drawings, or graphs; presentation materials; testing data, reports, or summaries; and/or notes, descriptions, or memoranda.

REQUEST FOR PRODUCTION NO. 21:

All Documents and Communications relating to the formation of CFIP NCF, including but not limited to hiring strategies, founding partners, and employee history.

REQUEST FOR PRODUCTION NO. 22:

All Documents and Communications relating or referring to 3GPP, ETSI, ATIS, and/or IEEE.

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

In Re: Neo Wireless, LLC Patent Litigation

Plaintiff

v.

Civil Action No. 2:22-md-03034-TGB

Defendant

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: CFIP NCF Holdings, LLC, c/o The Corporation Trust Company, Corporation Trust Center, 1209 Orange St, Wilmington, DE 19801

(Name of person to whom this subpoena is directed)

☒ **Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment: See Attachment B.

Place: Fish & Richardson P.C., 1 Marina Park Drive,
Boston, MA 02210, or at a location that is mutually agreed
upon by counsel.

Date and Time: July 27, 2023 at 9:00 am ET

The deposition will be recorded by this method: Videographer and Stenographer

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 6/15/2023

KINIKIA D. ESSIX, CLERK OF COURT

OR

/s/ Elizabeth G.H. Ranks

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Tesla, Inc., who issues or requests this subpoena, are:

Elizabeth G.H. Ranks, Fish & Richardson P.C., 1 Marina Park Drive, Boston, MA 02210, ranks@fr.com, ph: 617-542-5070

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to

TOPIC NO. 14:

Facts and circumstances regarding any analysis, research, or testing that compares the Patented Technology with any Prior Art or any other technology, whether the other technology was created by You or any third party.

TOPIC NO. 15:

Your contribution to the claimed invention, if any, and the contribution of any Named Inventor to the claimed invention, including but not limited to Your or any Inventor's diligence in reducing to practice or activities taken to reduce the invention to practice and when.

TOPIC NO. 16:

Any secondary considerations or other objective indicia of non-obviousness related to each of the Patents-in-Suit, including without limitation commercial success, long-felt need, failure of others, copying and imitation by others, praise by others, skepticism, industry recognition and praise for patented products, simultaneous invention, contemporaneous related technologies and market needs, licensing by others, and unexpected results.

TOPIC NO. 17:

Your knowledge and understanding of the features, functionality, and/or public availability of any fixed and/or broadband wireless project(s) or product(s) incorporating the project(s) known as "Project Dino," "Project Angel," "AT&T Digital Broadband," "SymmetryMX" or "SymmetryONE," including Your knowledge and understanding of how said features and functionality changed.

TOPIC NO. 18:

Facts and circumstances of any fixed and/or broadband wireless project(s) or product(s) incorporating the project(s) known as "Project Dino," "Project Angel," "AT&T Digital

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