

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE: NEO WIRELESS, LLC,
PATENT LITIGATION

Case No. 2:22-MD-03034-TGB
HON. TERRENCE G. BERG

JOINT MOTION TO DISMISS U.S. PATENT NO. 10,965,512

Plaintiff Neo Wireless, LLC (“Neo”) and the undersigned Defendants¹ jointly move to dismiss Neo’s claims against each of the Defendants for infringement of U.S. Patent No. 10,965,512 (‘512 Patent) with prejudice, with each

¹ The Defendants include Ford Motor Company; Tesla, Inc.; General Motors Company and General Motors LLC (collectively “GM”); FCA US LLC; Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc. and Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Credit Corporation (collectively “Toyota”); American Honda Motor Co., Inc. and Honda Development & Manufacturing of America, LLC (collectively “Honda”); and Nissan North America Inc. and Nissan Motor Acceptance Corporation a/k/a Nissan Motor Acceptance Company LLC (collectively “Nissan”).

party bearing its own fees and costs relating to the assertion of the ‘512 Patent against the Defendants in this case.

In the accompanying Joint Stipulation filed together herewith as Exhibit A and also submitted to the Judge for entry via the ECF Utilities function:

- Neo stipulates to the dismissal of the ‘512 Patent with prejudice.
- Defendants stipulate to dismiss their counterclaims (as applicable to each Defendant) relating to the ‘512 Patent.
- Neo agrees and covenants that neither it nor any of its subsidiaries or successors-in-interest will sue any of the Defendants or their current affiliates for infringement of the ‘512 Patent, or the specified foreign counterparts identified in Exhibit A, now or in the future.
- The undersigned Defendants General Motors, Ford, Nissan, Tesla, and Honda agree to terminate their respective IPR proceedings on the ‘512 Patent within seven (7) days of entry of the Joint Stipulation, and the Defendants agree not to participate in any further challenges to the validity of the ‘512 Patent.
- For the reasons in Exhibit A, dismissal of the ‘512 Patent and the terms of the Joint Stipulation shall not be introduced as evidence at any trial in this case.

Date: January 22, 2024

Respectfully submitted,

/s/ John S. LeRoy

John S. LeRoy (P61964)
Christopher C. Smith (P73936)
Kyle G. Konz (P79452)
BROOKS KUSHMAN P.C.
150 W. Second St., Suite 400N
Royal Oak, MI 48067-3846
Telephone: (248) 358-4400
jleroy@brookskushman.com
csmith@brookskushman.com
kkonz@brookskushman.com

***Counsel for Defendant
Ford Motor Company***

/s/ Christopher S. Stewart w/permission

Jason D. Cassady, TX Bar #24045625
Email: jcassady@caldwellcc.com
Christopher S. Stewart, TX Bar
#24079399
Email: cstewart@caldwellcc.com
Daniel R. Pearson, TX Bar #24070398
Email: dpearson@caldwellcc.com
Bailey A. Blaies, TX Bar #24109297
Email: bblaies@caldwellcc.com

CALDWELL CASSADY CURRY P.C.
2121 N. Pearl St., Suite 1200
Dallas, Texas 75201
Telephone: (214) 888-4848

Jaye Quadrozzi (P71646)
YOUNG, GARCIA &
QUADROZZI, PC
2775 Stansbury Blvd., Suite 125
Farmington Hills, MI 48334
Telephone: (248) 353-8620
Email: quadrozzi@youngpc.com

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

/s/ Joseph A. Herriges (w/permission)

Joseph A. Herriges, MN Bar No.
390350

Conrad A. Gosen, MN Bar No.
0395381

James Huguenin-Love, MN Bar No.
0398706

FISH & RICHARDSON P.C.
60 South Sixth Street, Suite 3200
Minneapolis, MN 55402
Telephone: (612) 335-5070
herriges@fr.com, gosen@fr.com,
huguein-love@fr.com

Michael J. McKeon, DC Bar No.
459780

Christian Chu, DC Bar No. 483948
Jared Hartzman, DC Bar No.
1034255

Joshua Carrigan, VA Bar No. 96911
FISH & RICHARDSON P.C.
1000 Maine Ave. SW, Suite 1000
Washington, DC 20024
Telephone: (202) 783-5070
mckeon@fr.com, chu@fr.com,
hartzman@fr.com, carrigan@fr.com

J. Michael Huget (P39150)
Sarah E. Waidelich (P80225)
HONIGMAN LLP
315 E. Eisenhower Pkwy., Ste. 100
Ann Arbor, MI 48108
Tel: (734) 418-4254
mhuget@honigman.com,
swaidelich@honigman.com

***Counsel for Defendants General
Motors Company and General
Motors LLC***

/s/ Thomas H. Reger II w/permission

Thomas H. Reger II, TX Bar #24032992
reger@fr.com

FISH & RICHARDSON P.C.
1717 Main Street, Suite 5000
Dallas, TX 75201
Telephone: (214) 747-5070

Lawrence Jarvis, GA Bar #102116
jarvis@fr.com
FISH & RICHARDSON P.C.
1180 Peachtree Street NE, 21st Floor
Atlanta, Georgia 30309
Telephone: (404) 892-5005

Elizabeth Ranks, MA Bar #693679
ranks@fr.com

FISH & RICHARDSON P.C.
1 Marina Park Drive
Boston, Massachusetts 02210
Telephone: (617) 542-5070

J. Michael Huget (P39150)
Sarah E. Waidelich (P80225)
HONIGMAN LLP
315 East Eisenhower Prkwy., Ste. 100
Ann Arbor, MI 48108
Tel: (734) 418-4254
mhuget@honigman.com
swaidelich@honigman.com

Counsel for Defendant Tesla, Inc.

/s/ Paul R. Steadman w/permission

Paul R. Steadman (IL Bar #6238160)
Matthew Satchwell (IL Bar #6290672)
Shuzo Maruyama (IL Bar #6313434)
DLA PIPER LLP (US)
444 West Lake Street, Suite 900
Chicago, IL 60606-0089
Tel: 312.368.2135
paul.steadman@us.dlapiper.com
matthew.satchwell@us.dlapiper.com
shuzo.maruyama@us.dlapiper.com

Brian Erickson (TX Bar #24012594)
DLA PIPER LLP (US)
303 Colorado Street, Suite 3000
Austin, Texas 78701-4653
Tel: 512.457.7059
brian.erickson@us.dlapiper.com

Dawn M. Jenkins
(TX Bar #24074484)
DLA PIPER LLP (US)
845 Texas Avenue, Suite 3800
Houston, TX 77002
Telephone: (713) 425-8454
dawn.jenkins@dlapiper.com

Counsel for Defendants Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc. and Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Credit Corporation

/s/ John T. Johnson w/permission

John T. Johnson (NY Bar #2589182)
Jeffrey Mok (NY Bar #5106059)
FISH & RICHARDSON P.C.
7 Times Square, 20th Floor
New York, NY 10036
Telephone: (212) 765-5070
E-mail: jjohnson@fr.com; jmok@fr.com

Ruffin B. Cordell (NY Bar #2589182)
Benjamin J Christoff
FISH & RICHARDSON P.C.
1000 Maine Ave., S.W., Suite 1000
Washington, D.C. 20024
Telephone: (202) 783-5070
E-mail: Cordell@fr.com

Thomas Branigan (P41774)
Matin Fallahi (P84524)
Bowman and Brooke LLP
41000 Woodard Avenue, 200 East
Bloomfield Hills, MI 48304
Telephone: (248) 205-3300
thomas.branigan@bowmanandbrooke.com
matin.fallahi@browmanandbrook.com

Counsel for Defendants

American Honda Motor Co., Inc. and Honda Development & Manufacturing of America, LLC

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.