

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

IN RE NEO WIRELESS, LLC	§	2:22-md-03034-TGB
PATENT LITIG.	§	HON. TERRENCE G. BERG
<hr/>		
NEO WIRELESS LLC,	§	2:22-cv-11403-TGB
<i>Plaintiff,</i>	§	HON. TERRENCE G. BERG
	§	
v.	§	
	§	
AMERICAN HONDA MOTOR CO. & HONDA DEVELOPMENT & MFG. CO. OF AMERICA, LLC,	§	JURY TRIAL DEMANDED
	§	
<i>Defendants.</i>	§	

**JOINT STIPULATION FOR A LIMITED EXTENSION
OF THE FACT DISCOVERY DEADLINE**

Plaintiff Neo Wireless LLC (“Neo”) and Defendants General Motors Co. and General Motors LLC (collectively “GM”), Tesla, Inc. (“Tesla”), Honda Motor Co., Inc. and Honda Development & Manufacturing of America, LLC (collectively “Honda”), 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”), Nissan North America Inc. and Nissan Motor Acceptance Corporation a/k/a Nissan Motor Acceptance Company LLC (collectively “Nissan”), Ford Motor Company (“Ford”), and FCA US LLC (“FCA”) (together, “Defendants”) jointly stipulate, subject to the approval of the Court, to a limited-purpose extension of the fact discovery deadline.

Specifically, Defendants request that the Court approve a one-day extension through January 30, 2024, for the purpose of facilitating the deposition of third-party Avanci LLC (“Avanci”). Avanci has agreed to be deposed on January 30, 2024, and does not oppose Defendants’ request. Plaintiff Neo Wireless LLC does not oppose the Defendants’ request, and has filed its own motion for a broader two-week extension of the fact discovery period.¹

Good cause exists for this stipulation in that Avanci-related evidence is relevant at least to the damages determination in this case, and the proposed extension is necessary to accommodate Avanci. The parties’ proposed extension in this stipulation would apply only to the deposition of Avanci.

Dated: January 25, 2024

Respectfully submitted,

¹ Neo states that in addition to this Avanci deposition, Honda, Ford, and Nissan have asked that certain of their party depositions take place after the close of discovery. And Neo has also been attempting to confer with Defendants about issues with other third-party discovery for several weeks, but except as to Toyota and FCA, those issues may be unresolved by the close of discovery. Neo proposed that the parties continue conferring to determine if one filing could resolve all the outstanding issues, but counsel for Honda insisted on filing this stipulation first. Because Neo does not oppose the relief sought, it does not oppose the stipulation.

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