

**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

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Fed. R. Civ. P. 56, Ford Motor Company (“Ford”), General Motors Company and General Motors LLC (collectively “GM”), Tesla, Inc. (“Tesla”), Nissan North America Inc. and Nissan Motor Acceptance Corporation a/k/a Nissan Motor Acceptance Company LLC (collectively “Nissan”), FCA US LLC (“FCA”), 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”), and American Honda Motor Co., Inc. and Honda Development & Manufacturing of America, LLC (collectively “Honda”) (together the “Defendants”) hereby move for summary judgment against Neo Wireless LLC (“Neo”) on the following grounds:

- (1) No infringement of Neo’s asserted U.S. Patent Nos. 10,075,941, 10,447,450, 10,771,302 and 10,833,908 (the “Asserted Patents”);
- (2) No damages prior to commencement of suit for failure to mark patented products pursuant to 35 U.S.C. § 287 (a); and
- (3) No willful patent infringement.

Defendants rely on the accompanying Brief in Support of this motion for summary judgment.

CONCURRENCE PURSUANT TO L.R. 7.1(a)

Pursuant to L.R. 7.1(a), the parties met-and-conferred telephonically on June 14, 2024 regarding the relief sought in this Motion. Neo did not concur on any of the relief requested herein.

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**BRIEF IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT**

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