

**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

JURY TRIAL DEMANDED

**INDEX OF DOCUMENTS PROPOSED FOR SEALING**

Pursuant to L.R. 5.3(b)(3)(A)(i), Defendants provide the following index of documents proposed for sealing. No party objects to the request to seal any of the listed documents. In the document description field, any confidentiality designation under the Protective Orders in this case (D.I.s 125, 126, 210) is also noted. Additionally, the parties to this action, along with third-parties, have an interest in maintaining the documents under seal, as detailed in the chart below.

	<b>Document Description</b>	<b>Privacy Interests</b>
Brief	Defendants' Brief in Support of Its Motion to Exclude the Opinions of Neo's Damages Expert, Ms. Harvey, and Certain Opinions of Neo's Technical Experts, Dr. Mahon and Mr. Jones [contains citations to documents listed below, which are all designated under the Protective Order in this case]	Plaintiff's and third parties' interests related to business decisions and licensing practices; third parties related to technical information and source code

	<b>Document Description</b>	<b>Privacy Interests</b>
Exhibit A	Settlement Agreement, produced as NEO-AUTO_0113775 [designated Confidential]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit B	Settlement and License Agreement, produced as NEO-AUTO_0092635 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit C	Excerpts of Elizabeth Dean Rebuttal Report, dated Apr. 25, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third parties' interest related to business decisions and licensing practices
Exhibit D	Patent License and Settlement Agreement, produced as NEO-AUTO 0093055 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit E	Patent License and Settlement Agreement, produced as NEO-AUTO_0094028 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit F	Patent License and Settlement Agreement, produced as NEO-AUTO_0104908 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit G	Bonnie Harvey Expert Report, dated Mar. 28, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third parties' interest related to business decisions and licensing practices
Exhibit H	Excerpts of Deposition Transcript of Bonnie Harvey, dated May 21, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third parties' interest related to business decisions and licensing practices

	<b>Document Description</b>	<b>Privacy Interests</b>
Exhibit J	Excerpts of Avanci 2G, 3G & 4G SEP Landscape, produced as AVANCI_INRENEO000097 [designated Highly Confidential-Attorneys' Eyes Only]	Defendant GM and third party's interest related to business decisions and licensing practices
Exhibit L	Neo Wireless Licensing Presentation, produced as NEO-AUTO_0104883 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff's interest related to business decisions and licensing practices
Exhibit N	Excerpts of Bonnie Harvey Expert Report Automaker Appendices N.1 – FCA Appendix N.2 – GM Appendix N.3 – Honda Appendix N.4 – Nissan Appendix N.5 – Tesla Appendix N.6 – Toyota Appendix [all designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff's, Defendants', and third parties' interest related to commercial practices, business decisions, and licensing practices
Exhibit P	Mark Mahon Opening Expert Report, Appendix I: Source Code [designated Highly Confidential-Attorneys' Eyes Only; designated Outside Attorneys' Eyes Only – Source Code]	Defendants' and third parties' interests related to technical information and source code
Exhibit Q	Excerpts of Deposition Transcript of Mark Mahon, dated May 16-17, 2024 [designated Confidential-Attorneys' Eyes Only]	Defendants' and third parties' interests related to technical information and source code
Exhibit R	Nigel Jones Expert Report, Appendix A [designated Highly Confidential-Attorneys' Eyes Only; designated Outside Attorneys' Eyes Only – Source Code]	Defendants' and third parties' interests related to technical information and source code

	<b>Document Description</b>	<b>Privacy Interests</b>
Exhibit S	Mark Mahon Opening Expert Report, Appendix F: LTE Vehicles, Components, and Source Code, and Excerpts of Appendix 1, 2, and 3 [designated Highly Confidential-Attorneys' Eyes Only; designated Outside Attorneys' Eyes Only – Source Code]	Defendants' and third parties' interests related to technical information and source code
Exhibit T	Mark Mahon Opening Expert Report, Appendix E: Accused Products [designated Restricted – Attorneys' Eyes Only]	Defendants' and third parties' interests related to technical information and source code
Exhibit U	Nigel Jones Expert Report, Tesla Supplement [designated Highly Confidential-Attorneys' Eyes Only; designated Outside Counsel Restricted – Source Code]	Defendant Tesla and third parties' interests related to technical information and source code
Exhibit V	Excerpts of Deposition Transcript of Nigel Jones, dated May 3, 2024 [designated Highly Confidential-Attorneys' Eyes Only; designated Outside Attorneys' Eyes Only – Source Code]	Defendants' and third parties' interests related to technical information and source code
Exhibit X	Mark Mahon Opening Expert Report, Tesla Appendix I: Source Code [designated Highly Confidential-Attorneys' Eyes Only; designated Outside Attorneys' Eyes Only – Source Code; designated Outside Counsel Restricted – Source Code]	Defendants' and third parties' interests related to technical information and source code