

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

IN RE NEO WIRELESS, LLC  
PATENT LITIG.

Case No. 2:22-md-03034-TGB  
HON. TERRENCE G. BERG  
JURY TRIAL DEMANDED

**ERRATA TO PLAINTIFF'S MOTION  
FOR SUMMARY JUDGMENT ON DEFENDANTS'  
INEQUITABLE CONDUCT AND UNCLEAN HANDS DEFENSES**

Based on guidance from the Court, Plaintiff Neo Wireless, LLC (“Neo”) submits this Errata Sheet to its *Motion for Summary Judgment on Defendants’ Inequitable Conduct and Unclean Hands Defenses* [ECF No. 254] to add “a concise statement of the issues presented” as described in Local Rule 7.1(d)(2), which was inadvertently omitted, as well as a statement on concurrence pursuant to Local Rule 7.1(a). Attached herewith is a corrected sheet, which will be inserted as a new page following the Table of Contents. The pagination of the Table of Authorities will be updated accordingly.

DATED: June 21, 2024

Respectfully submitted,

/s/ Jason D. Cassady

Jason D. Cassady

Texas State Bar No. 24045625

Email: [jcassady@caldwellcc.com](mailto:jcassady@caldwellcc.com)

Christopher S. Stewart

Texas State Bar No. 24079399

Email: [cstewart@caldwellcc.com](mailto:cstewart@caldwellcc.com)

**CALDWELL CASSADY CURRY P.C.**

2121 N. Pearl St., Suite 1200

Dallas, Texas 75201

Telephone: (214) 888-4848

Facsimile: (214) 888-4849

Jaye Quadrozzi (P71646)

Email: [jcquadrozzi@varnumlaw.com](mailto:jcquadrozzi@varnumlaw.com)

**VARNUM LLP**

480 Pierce Street, Suite 300

Birmingham, Michigan 48009

Telephone: (248) 567-7800

Facsimile: (214) 567-7423

**ATTORNEYS FOR PLAINTIFF**

**NEO WIRELESS LLC**

**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was served on all counsel via electronic mail on June 21, 2024.

/s/ Jason D. Cassady

Jason D. Cassady