REDACTED

PLAINTIFF NEO WIRELESS, LLC'S BRIEF IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT ON DEFENDANTS' INEQUITABLE CONDUCT AND UNCLEAN HANDS DEFENSES



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

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

Plaintiff Neo Wireless, LLC ("Plaintiff" or "Neo"), through their counsel, respectfully moves this Court for summary judgment:

- 1) Dismissing Defendants' inequitable conduct defense and counterclaim (ECF Nos. 104, 105, 107, 108, 109);¹
- 2) Dismissing Defendants' unclean hands defense (ECF Nos. 104, 105, 107, 108, 109);²

In support of its motion, Neo relies upon the authorities and arguments set forth in the accompanying brief and attached exhibits.

² Defendants Nissan and Honda have failed to file an Answer in this case. However, both Nissan and Honda joined all defendants in Defendants' Invalidity and Unenforceability Contentions, which include an unenforceability section asserting unclean hands.



¹ Defendants Nissan and Honda have failed to file an Answer in this case. However, both Nissan and Honda joined all defendants in Defendants' Invalidity and Unenforceability Contentions, which include an unenforceability section asserting inequitable conduct.

Counsel for Neo conferred with counsel for Defendants on June 14th, 2024.

Counsel explained the basis for this motion but was unable to obtain concurrence on the relief sought.



DATED: June 20, 2024 Respectfully submitted,

/s/ Jason D. Cassady

Jason D. Cassady

Texas State Bar No. 24045625

Email: jcassady@caldwellcc.com

Christopher S. Stewart

Texas State Bar No. 24079399

Email: cstewart@caldwellcc.com

James F. Smith

Texas State Bar No. 24129800 Email: jsmith@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

VARNUM LLP

480 Pierce Street, Suite 300

Birmingham, Michigan 48009

Telephone: (248) 567-7800

Facsimile: (214) 567-7423

ATTORNEYS FOR PLAINTIFF NEO WIRELESS LLC



HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY

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