

**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 (ECF Nos. 125, 126) 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.

	Document Description	Privacy Interests
Brief	Defendants' Opposition to Plaintiff's Motion to Strike or Exclude Certain Portions of the Testimony of Defendants' Experts [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

	Document Description	Privacy Interests
Exhibit 2	Excerpts of Expert Report of Harry V. Bims, Ph.D., dated Mar. 28, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Defendants' interests related to technical arguments and information
Exhibit 4	Excerpts from Bonnie Harvey Expert Report, dated Mar. 28, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit 5	Excerpts of Deposition Transcript of Bonnie Harvey, dated May 21, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff and third party's interest related to business decisions and licensing practices
Exhibit 6	Excerpts of Deposition Transcript of Nigel Andrew Jones, dated May 3, 2024 [designated Confidential - Subject to QualComm Supplemental Protective Order]	Plaintiff's and third parties' interests related technical information and source code
Exhibit 7	Excerpts of Deposition Transcript of Andrew John Mayo, Ph.D., dated May 14, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff's and third parties' interests related technical information and source code
Exhibit 10	Excerpts of Deposition Transcript of Nancy J. Linck, Ph.D., dated May 21, 2024 [designated Highly Confidential-Attorneys' Eyes Only]	Plaintiff's and third parties' interests related business and technical information
Exhibit 11	White Paper, ATT_NEO_P1_008909-008928 [designated Confidential-Attorneys' Eyes Only]	Third party's interests related business and technical information