

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<p>IN RE NEO WIRELESS, LLC PATENT LITIG.</p>	<p>Case No. 2:22-md-03034-TGB Hon. Terrence G. Berg</p>
<p>NEO WIRELESS, LLC, Plaintiff, v. AMERICAN HONDA MOTOR CO., INC. AND HONDA DEVELOPMENT & MANUFACTURING OF AMERICA, LLC, Defendants.</p>	<p>Case No. 2:22-cv-11403-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED</p>
<p>NEO WIRELESS, LLC, Plaintiff, v. NISSAN NORTH AMERICA INC. AND NISSAN MOTOR ACCEPTANCE CORPORATION a/k/a NISSAN MOTOR ACCEPTANCE COMPANY LLC, Defendants.</p>	<p>Case No. 2:22-cv-11405-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED</p>

**DEFENDANTS HONDA AND NISSAN'S MOTION TO
DISMISS PLAINTIFF'S CLAIMS OF WILLFUL AND
INDUCED PATENT INFRINGEMENT**

Defendants American Honda Motor Co., Inc. ("AHM") and Honda
Development & Manufacturing of America, LLC ("HDMA") (collectively,

“Honda”); and Defendants Nissan North America Inc. (“Nissan NA”) and Nissan Motor Acceptance Corporation a/k/a Nissan Motor Acceptance Company LLC (“NMAC”) (collectively, “Nissan”); (together, “Honda and Nissan Defendants”), by their attorneys, move to dismiss Neo Wireless, LLC’s (“Plaintiff” or “Neo”) Amended Complaint Against Honda, Case No. 2:22-CV-11403-TGB, Dkt. No. 4 (E.D. Mich.) (“Honda Amended Complaint”) and Amended Complaint Against Nissan, Case No. 2:22-CV-11405-TGB, Dkt. No. 5 (E.D. Mich.) (“Nissan Amended Complaint”); collectively “Amended Complaints”; on the ground that Neo has failed to state claims for willful infringement and induced infringement pursuant to Federal Rule of Civil Procedure 12(b)(6).

Pursuant to Local Rule 7.1(a), the parties’ counsel met and conferred on this motion. No agreement was reached.

Dated: August 10, 2022

Respectfully submitted,

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Respectfully submitted,

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**BRIEF IN SUPPORT OF DEFENDANTS HONDA AND
NISSAN'S MOTION TO DISMISS PLAINTIFF'S CLAIMS OF
WILLFUL AND INDUCED PATENT INFRINGEMENT**

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