

**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

**JOINT MOTION FOR ENTRY OF DEFAULT PROTECTIVE ORDER**

The parties to this case, by and through their respective counsel, hereby file this Joint Motion for Entry of Default Protective Order. As discussed at the September 16, 2022 Scheduling Conference, the parties have begun the process of negotiating a fulsome Stipulated Protective Order, and intend to submit that to the Court (with any disputes) as soon as possible. In the meantime, the parties agree on the entry of the Court's Default Protective Order, attached hereto as Exhibit A. The parties respectfully request that the Court enter the Default Protective Order as attached hereto.

Date: September 23, 2022

/s/ Paul R. Steadman

Paul R. Steadman  
(Illinois Bar No. 6238160)  
Matthew Satchwell  
(Illinois Bar No. 6290672)  
Shuzo Maruyama  
(Illinois Bar No. 6313434)  
DLA PIPER LLP (US)  
444 West Lake Street, Suite 900  
Chicago, IL 60606-0089  
Tel: 312.368.2135  
Fax: 312.251.2850  
paul.steadman@us.dlapiper.com  
matthew.satchwell@us.dlapiper.com  
shuzo.maruyama@us.dlapiper.com

Brian Erickson (Texas Bar No. 24012594)  
DLA PIPER LLP (US)  
303 Colorado Street, Suite 3000  
Austin, Texas 78701-4653  
Tel: 512.457.7059  
Fax: 512.721.2263  
brian.erickson@us.dlapiper.com

***Counsel for Defendants Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc. and Toyota Motor Engineering & Manufacturing North America, Inc. and Toyota Motor Credit Corporation***

/s/ Conrad A Gosen

Joseph A. Herriges  
MN Bar No. 390350  
Conrad A. Gosen  
MN Bar No. 0395381  
James Huguenin-Love

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  
Daniel R. Pearson  
Texas State Bar No. 24070398  
Email: dpearson@caldwellcc.com  
Bailey A. Blaies  
Texas State Bar No. 24109297  
Email: bblaies@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)

**YOUNG, GARCIA &  
QUADROZZI, PC**

2775 Stansbury Blvd., Suite 125  
Farmington Hills, MI 48334  
Telephone: (248) 353-8620  
Email: quadrozzi@youngpc.com

***Attorneys for Plaintiff  
NEO WIRELESS, LLC***

/s/ Matthew J. Moore

Matthew J. Moore  
Michael A. David  
Benjamin L. Smith  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000

MN Bar No. 0398706  
FISH & RICHARDSON P.C.  
60 South Sixth Street, 3200 RBC Plaza  
Minneapolis, MN 55402  
Telephone: (612) 335-5070  
Facsimile: (612) 288-9696  
herriges@fr.com, gosen@fr.com,  
huguein-love@fr.com

Michael J. McKeon, DC Bar No. 459780  
Christian Chu, DC Bar No. 483948  
Jared Hartzman, DC Bar No. 1034255  
Joshua Carrigan, VA Bar No. 96911  
FISH & RICHARDSON P.C.  
1000 Maine Avenue SW, Suite 1000  
Washington, DC 20024  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331  
mckeon@fr.com, chu@fr.com,  
hartzman@fr.com, carrigan@fr.com

J. Michael Huget (P39150)  
Sarah E. Waidelich (P80225)  
HONIGMAN LLP  
315 East Eisenhower Parkway  
Suite 100  
Ann Arbor, MI 48108  
Tel: (734) 418-4254  
Fax: (734) 418-4255  
mhuget@honigman.com,  
swaidelich@honigman.com

***Counsel for Defendants General Motors  
Company and General Motors LLC***

/s/ Celine J. Crowson  
Celine J. Crowson  
(DC Bar No. 0436549A)  
Hogan Lovells US LLP  
555 Thirteenth St, NW

Washington, DC 20004  
Tel: (202) 637-2000  
Fax: (202) 637-2201  
matt.moore@lw.com  
michael.david@lw.com  
ben.smith@lw.com

Clement J. Naples  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 906-1200  
Fax: (212) 751-4864  
clement.naples@lw.com

Gabrielle A. LaHatte  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
Tel: (415) 391-0600  
Fax: (415) 395-8095  
gabrielle.lahatte@lw.com

***Attorneys for Defendant Ford  
Motor Company***

/s/ Thomas H. Reger II

Thomas H. Reger II  
Texas Bar No. 24032992  
reger@fr.com  
FISH & RICHARDSON P.C.  
1717 Main Street, Suite 5000  
Dallas, TX 75201  
Telephone: (214) 747-5070

Lawrence Jarvis  
Georgia Bar No. 102116  
jarvis@fr.com  
FISH & RICHARDSON P.C.

Washington, DC 20004  
Telephone: (202) 637-5703  
Facsimile: (202) 637-5910  
Email: [celine.crowson@hoganlovells.com](mailto:celine.crowson@hoganlovells.com)

***Counsel for Defendant Mercedes-Benz USA, LLC***

/s/ Frank C. Cimino, Jr.

Frank C. Cimino, Jr.  
Megan S. Woodworth  
Jonathan L. Falkler  
Robert C. Tapparo  
VENABLE LLP  
600 Massachusetts Avenue, NW  
Washington, DC 20001  
(202) 344-4569  
[FCCimino@Venable.com](mailto:FCCimino@Venable.com)  
[MSWoodworth@Venable.com](mailto:MSWoodworth@Venable.com)  
[JLFalkler@Venable.com](mailto:JLFalkler@Venable.com)  
[RCTapparo@Venable.com](mailto:RCTapparo@Venable.com)

Patrick G. Seyferth (P47575)  
Susan M. McKeever (P73533)  
BUSH SEYFERTH PLLC  
100 W. Big Beaver Road, Suite 400  
Troy, MI 48084  
(248) 822-780  
[seyferth@bsplaw.com](mailto:seyferth@bsplaw.com)  
[mckeever@bsplaw.com](mailto:mckeever@bsplaw.com)

***Attorneys for FCA US LLC***

/s/ Peter J. Brennan

Reginald J. Hill (IL Bar #6225173)  
Peter J. Brennan (IL Bar #6190873)  
JENNER & BLOCK LLP  
353 N. Clark St.  
Chicago, IL 60654  
Telephone: (312) 222-9350

1180 Peachtree Street NE, 21st  
Floor  
Atlanta, Georgia 30309  
Telephone: (404) 892-5005  
Facsimile: (404) 892-5002

Elizabeth Ranks  
Massachusetts Bar No. 693679  
[ranks@fr.com](mailto:ranks@fr.com)  
FISH & RICHARDSON P.C.  
1 Marina Park Drive  
Boston, Massachusetts 02210  
Telephone: (617) 542-5070  
Facsimile: (617) 542-8906

J. Michael Huget (P39150)  
Sarah E. Waidelich (P80225)  
HONIGMAN LLP  
315 East Eisenhower Parkway  
Suite 100  
Ann Arbor, MI 48108  
Tel: (734) 418-4254  
[mhuget@honigman.com](mailto:mhuget@honigman.com)  
[swaidelich@honigman.com](mailto:swaidelich@honigman.com)

***Counsel for Defendant Tesla, Inc.***

rhill@jenner.com  
pbrennan@jenner.com

***Counsel for Defendants***  
**NISSAN NORTH AMERICA INC.**  
**AND NISSAN MOTOR**  
**ACCEPTANCE CORPORATION a/k/a**  
**NISSAN MOTOR ACCEPTANCE**  
**COMPANY LLC**

/s/ John T. Johnson  
John T. Johnson  
FISH & RICHARDSON P.C.  
7 Times Square, 20th Floor  
New York, NY 10036  
Telephone: (212) 765-5070  
Facsimile: (212) 258-2291  
E-mail: jjohnson@fr.com

Ruffin B. Cordell  
Benjamin J Christoff  
FISH & RICHARDSON P.C.  
1000 Maine Avenue, S.W.  
Suite 1000 Washington, D.C. 20024  
Telephone: (202) 783-5070  
Facsimile: (202) 783-2331  
E-mail: Cordell@fr.com

Thomas Branigan (P41774)  
Bowman and Brooke LLP  
41000 Woodard Avenue, 200 East  
Bloomfield Hills, MI 48304  
Telephone: (248) 205-3300  
Facsimile: (248) 205-3399  
thomas.branigan@bowmanandbrooke.com

***Counsel for Defendants***  
**AMERICAN HONDA MOTOR CO.,**  
**INC. AND HONDA DEVELOPMENT**

/s/Deirdre M. Wells  
Susan M. McKeever  
Justin B. Weiner  
Bush Seyferth PLLC  
100 West Big Beaver Road  
Suite 400  
Troy, MI 48084  
(248) 822-7851  
mckeever@bsplaw.com  
weiner@bsplaw.com

Daniel E. Yonan  
Deirdre M. Wells  
Ryan C. Richardson  
William H. Milliken  
Anna G. Phillips  
Sterne, Kessler, Goldstein & Fox  
P.L.L.C.  
1100 New York Avenue NW  
Suite 600  
Washington, DC 20005  
(202) 371-2600  
dyonan@sternekessler.com  
dwells@sternekessler.com  
rrichardson@sternekessler.com  
wmilliken@sternekessler.com  
aphillips@sternekessler.com

***Counsel for Defendants***  
***Volkswagen Group of America, Inc.***

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