

**IN THE 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, <i>Plaintiff,</i> v. FORD MOTOR COMPANY <i>Defendant.</i></p>	<p>Case No. 2:22-cv-11402-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED</p>
<p>NEO WIRELESS, LLC, <i>Plaintiff,</i> v. AMERICAN HONDA MOTOR CO., INC. AND HONDA DEVELOPMENT & MANUFACTURING OF AMERICA, LLC, <i>Defendant.</i></p>	<p>Case No. 2:22-cv-11403-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED</p>

NEO WIRELESS, LLC,

Plaintiff,

v.

VOLKSWAGEN GROUP OF
AMERICA, INC. & VOLKSWAGEN
GROUP OF AMERICA
CHATTANOOGA OPERATIONS,
LLC,

Defendant.

Case No. 2:22-cv-11404-TGB

Hon. Terrence G. Berg

JURY TRIAL DEMANDED

NEO WIRELESS, LLC,

Plaintiff,

v.

NISSAN NORTH AMERICA INC.
AND NISSAN MOTOR
ACCEPTANCE CORPORATION
a/k/a NISSAN MOTOR
ACCEPTANCE COMPANY LLC,

Defendant.

Case No. 2:22-cv-11405-TGB

Hon. Terrence G. Berg

JURY TRIAL DEMANDED

<p>NEO WIRELESS, LLC,</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p style="text-align: center;">v.</p> <p>TOYOTA MOTOR CORPORATION, TOYOTA MOTOR NORTH AMERICA, INC., TOYOTA MOTOR SALES, U.S.A., INC., & TOYOTA MOTOR ENGINEERING & MANUFACTURING NORTH AMERICA, INC., & TOYOTA MOTOR CREDIT CORPORATION,</p> <p style="text-align: center;"><i>Defendant.</i></p>	<p>Case No. 2:22-cv-11406-TGB</p> <p>Hon. Terrence G. Berg</p> <p>JURY TRIAL DEMANDED</p>
<p>NEO WIRELESS, LLC,</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p style="text-align: center;">v.</p> <p>GENERAL MOTORS COMPANY & GENERAL MOTORS LLC,</p> <p style="text-align: center;"><i>Defendant.</i></p>	<p>Case No. 2:22-cv-11407-TGB</p> <p>Hon. Terrence G. Berg</p> <p>JURY TRIAL DEMANDED</p>
<p>NEO WIRELESS, LLC,</p> <p style="text-align: center;"><i>Plaintiff,</i></p> <p style="text-align: center;">v.</p> <p>TESLA, INC.,</p> <p style="text-align: center;"><i>Defendant.</i></p>	<p>Case No. 2:22-cv-11408-TGB</p> <p>Hon. Terrence G. Berg</p> <p>JURY TRIAL DEMANDED</p>

<p>NEO WIRELESS, LLC, <i>Plaintiff,</i></p> <p>v.</p> <p>MERCEDES-BENZ USA, LLC, <i>Defendant.</i></p>	<p>Case No. 2:22-cv-11769-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED</p>
<p>NEO WIRELESS, LLC, <i>Plaintiff,</i></p> <p>v.</p> <p>FCA US, LLC, <i>Defendant.</i></p>	<p>Case No. 2:22-cv-11770-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED</p>

**DEFENDANTS’ JOINT MOTION
TO REDUCE THE NUMBER OF ASSERTED CLAIMS**

Defendants Ford Motor Company, American Honda Motor Co., Inc., Honda Development & Manufacturing of America, LLC, Volkswagen Group of America, Inc., Volkswagen Group Of America Chattanooga Operations, LLC, Nissan North America Inc., Nissan Motor Acceptance Corporation a/k/a Nissan Motor Acceptance Company LLC, Toyota Motor Corporation, Toyota Motor North America, Inc., Toyota Motor Sales, U.S.A., Inc., Toyota Motor Engineering & Manufacturing North America, Inc., Toyota Motor Credit Corporation, General Motors Company, General Motors LLC, Tesla, Inc., Mercedes-Benz USA, LLC, and FCA US, LLC (collectively “Defendants”) respectfully request the Court issue an

order requiring Plaintiff Neo Wireless, LLC (“Plaintiff”) to reduce the number of asserted patent claims to no more than three claims per patent-in-suit identified in its infringement contentions by November 23, 2022 (at least one week prior to the preliminary identification of disputed claim terms to be construed on December 1, 2022) to ensure that the Court’s claim constructions will be directed to those claims Plaintiff will actually assert at trial. The complete bases for Defendants’ motion are set forth in Defendants’ Joint Brief in Support of Motion to Reduce the Number of Asserted Claims, submitted herewith.

Pursuant to Local Rule 7.1(a), the parties met and conferred on this motion. Plaintiff opposes Defendants’ motion.

A proposed order is being submitted herewith via email.

Dated: October 21, 2022

Respectfully submitted,

/s/ Matthew Moore

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