Exhibit B



dUNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In Re: Neo Wireless, LLC, Patent Litigation

Case No. Hon. Terrence G. Berg

JOINT RULE 26 REPORT AND PROPOSED SCHEDULING ORDER

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the parties to this case, by and through their respective counsel, jointly submit this Rule 26(f) Report and Proposed Scheduling Order:

	Neo's Proposal	Defendants' Proposal	1
Initial Disclosures	Wednesday, September 14, 2022	September 14, 2022	ı
Fact Discovery Commences	Wednesday, August 10, 2022	August 10, 2022 One month after Markman order	-<
Infringement Contentions	Wednesday, September 28, 2022	Sept. 28, 2022	ı
Invalidity and Non Infringement Contentions	Thursday, October 27, 2022;	Nov. 16, 2022 [Invalidity Contentions]; Dec. 22, 2022 [Non-Infringement Contentions]	
[Defendant's Proposal: Validity Contentions]		Dec. 22, 2022	ı
Deadline to Amend Pleadings	Friday, December 16, 2022	Dec. 16, 2022	i
Deadline to Add Parties	Friday, December 16, 2022	September 30, 2022	
Contact Technical Advisor to Schedule Settlement Conference (Court)	TBD	TBD	
Initial Identification of Disputed Claim Terms	Thursday, December 1, 2022	Nov. 28December 1, 2022	-<
Exchange Proposed Interpretations of Disputed Claim Terms	Wednesday, December 28, 2022	Dec. 2815, 2022	<u> </u>

Formatted: Font color: Auto
Formatted: Font color: Auto

Formatted: Font color: Accent 1

Formatted: Font color: Auto
Formatted: Font color: Auto
Formatted: Font color: Red
Formatted: Font color: Accent 1
Formatted: Font color: Accent 1

1



	Neo's Proposal	Defendants' Proposal
Final Identification of Disputed	Wednesday, January 4, 2022	Jan. 4 <u>18</u> , 2023
Claim Terms	L	*
Informal Technology Tutorial	TBD (January 18, 2023	Jan. 18Feb 1, 2023
(Court)	According to Model	
	Timeline)	
Plaintiff's Opening Claim	Thursday, February 16, 2023	Feb. 2016, 2023
Construction Briefs		
Defendant's Responsive Claim	Thursday, March 16, 2023	Mar. 2016, 2023
Construction Brief		
Plaintiff's Reply Claim	Thursday, March 30, 2023	Apr. 3Mar. 30, 2023
Construction Brief		
Claim Construction Hearing	TBD	TBD
(Court) (2-3 months from		
deadline of Plaintiff's Reply		
Claim Construction Brief)		
Beginning of fact discovery	Wednesday, August 10,	1 mon. after Markman
,	2022	Order
[Plaintiff's Proposal: Deadline	1 Month after Markman	1 Month after Markman
for Parties to Amend	Order	Order
Contentions-		
[Defendant's Proposal: Deadline		1 mon. after Markman
to amend burden contentions		Order
after Markman]		
[Defendant's Proposal: Deadline		2 mon. after Markman
to amend non-burden		Order
contentions after Markman]		
Fact Discovery Closes	2 Months from Claim	63 mon. after <i>Markman</i>
	Construction Opinion	<u>Order</u>
Expert Reports on Infringement	3 Months from Claim	74 mon. after <i>Markman</i>
(Plaintiff), Invalidity	Construction Opinion	<u>Order</u>
(Defendant), and Damages		
(Plaintiff)		
Rebuttal Expert Reports	4 Months from Claim	96 mon. after Markman
• •	Construction Opinion	<u>Order</u>
Expert Discovery Deadline	2 Weeks from Rebuttal	448 mon. after Markman
	Expert Report Deadline	<u>Order</u>
Dispositive Motion Deadline	2 Weeks from Expert	129 mon. after Markman
•	Discovery Deadline	Order
Oppositions to dispositive	21 days from filing	21 days from filing
motions		
Replies to dispositive motions	14 days from oppositions	14 days from oppositions

Formatted: Font color: Red
Formatted: Font color: Accent 1
Formatted: Font color: Accent 1
Formatted: Font color: Red
Formatted: Font color: Accent 1
Formatted: Font color: Auto
Formatted: Font color: Auto
Formatted: Font color: Auto

Formatted: Font: Not Italic

I. RULE 26(f) CONFERENCE.

2



Pursuant to Rule 26(f), the parties held a meeting on August 10, 2022, which was attended by the following attorneys:

Christopher Stewart
Daniel Pearson
Bailey Blaies
Bjorn Blomquist
Caldwell Cassady Curry P.C.
2121 N. Pearl St., Suite 1200 Dallas, Texas
75201 Telephone: (214) 888-4848

Attorney
FIRM
ADDRESS
ADDRESS
TELEPHONE NUMBER

Attorney for Defendant

Attorneys for Plaintiff

II. DISCOVERY PLAN

The discovery in this case is limited to the disclosures described in the following paragraphs:. Where a limit is defined by Defendant that limit shall apply to a group of legally affiliated Defendants.

- a. Interrogatories. Plaintiff may serve up to [Plaintiff's Proposal: 35 interrogatories on each Defendant/Defendant's Proposal: 15 joint interrogatories on the Defendants and may serve up to 10 individualized interrogatories on each Defendant]. Defendants may serve 15 joint interrogatories on Plaintiff, and each party Defendant may serve [Plaintiff's Proposal: 8/Defendant's Proposal: 10] individualized interrogatories on Plaintiff. "Party" means a party and its affiliated companies. "Side" means a party or group of parties with a common interest.
- b. Requests for Admission. Plaintiff may serve up to [Plaintiff's Proposal: 50 requests for admission on each party Defendant/Defendant's Proposal:20 joint requests for admission and 20 individualized requests for admission on each party Defendant]. Defendants shall serve [Plaintiff's Proposal: 15/



Defendant's Proposal: 20] joint requests for admission on Plaintiff, and each party Defendant may serve [Plaintiff's Proposal: 10/Defendant's Proposal: 20] individualized requests for admission on Plaintiff. This limit does not apply to requests for admission that seek an admission as to the authenticity of a document or thing. Such requests for admission as to authenticity will be unlimited, clearly denoted as such, and served separately from other requests for admission.

. Depositions.



DOCKET

Explore Litigation Insights



Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time** alerts and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.

