

Exhibit B

**UNITED 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
Initial Disclosures	Wednesday, September 14, 2022	September 14, 2022
Fact Discovery Commences	Wednesday, August 10, 2022	August 10, 2022 One month after Markman order
Infringement Contentions	Wednesday, September 28, 2022	Sept. 28, 2022
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
Deadline to Amend Pleadings	Friday, December 16, 2022	Dec. 16, 2022
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. 28 December 1, 2022
Exchange Proposed Interpretations of Disputed Claim Terms	Wednesday, December 28, 2022	Dec. 28 15, 2022

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	Neo's Proposal	Defendants' Proposal
Final Identification of Disputed Claim Terms	Wednesday, January 4, 2022	Jan. 4¹⁸, 2023
Informal Technology Tutorial (Court)	TBD (January 18, 2023 According to Model Timeline)	Jan. 18Feb 1, 2023
Plaintiff's Opening Claim Construction Briefs	Thursday, February 16, 2023	Feb. 20¹⁶, 2023
Defendant's Responsive Claim Construction Brief	Thursday, March 16, 2023	Mar. 20¹⁶, 2023
Plaintiff's Reply Claim Construction Brief	Thursday, March 30, 2023	Apr. 3Mar. 30, 2023
Claim Construction Hearing (Court) (2-3 months from deadline of Plaintiff's Reply Claim Construction Brief)	TBD	TBD
Beginning of fact discovery	Wednesday, August 10, 2022	1 mon. after Markman Order
{Plaintiff's Proposal: Deadline for Parties to Amend Contentions}	1 Month after Markman Order	1 Month after Markman Order
{Defendant's Proposal: Deadline to amend burden contentions after Markman}		1 mon. after Markman Order
{Defendant's Proposal: Deadline to amend non-burden contentions after Markman}		2 mon. after Markman Order
Fact Discovery Closes	2 Months from Claim Construction Opinion	63 mon. after Markman Order
Expert Reports on Infringement (Plaintiff), Invalidity (Defendant), and Damages (Plaintiff)	3 Months from Claim Construction Opinion	74 mon. after Markman Order
Rebuttal Expert Reports	4 Months from Claim Construction Opinion	96 mon. after Markman Order
Expert Discovery Deadline	2 Weeks from Rebuttal Expert Report Deadline	118 mon. after Markman Order
Dispositive Motion Deadline	2 Weeks from Expert Discovery Deadline	129 mon. after Markman Order
Oppositions to dispositive motions	21 days from filing	21 days from filing
Replies to dispositive motions	14 days from oppositions	14 days from oppositions

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I. RULE 26(f) CONFERENCE.

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.

c. **Depositions.**

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