IN THE UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

IN RE NEO WIRELESS, LLC PATENT LITIG.	Case No. 2:22-md-03034-TGB Hon. Terrence G. Berg
NEO WIRELESS, LLC, <i>Plaintiff,</i> v. FORD MOTOR COMPANY, <i>Defendant.</i>	Case No. 2:22-cv-11402-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED
NEO WIRELESS, LLC,	
<i>Plaintiff,</i> v. AMERICAN HONDA MOTOR CO., INC. AND HONDA DEVELOPMENT & MANUFACTURING OF AMERICA, LLC, <i>Defendant.</i>	Case No. 2:22-cv-11403-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED

A L A R M Find authenticated court documents without watermarks at <u>docketalarm.com</u>.

DOCKET

NEO WIRELESS, LLC, <i>Plaintiff,</i> v. VOLKSWAGEN GROUP OF AMERICA, INC. & VOLKSWAGEN GROUP OF AMERICA CHATTANOOGA OPERATIONS, LLC, <i>Defendant.</i>	Case No. 2:22-cv-11404-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED
NEO WIRELESS, LLC, <i>Plaintiff,</i> v. NISSAN NORTH AMERICA INC. AND NISSAN MOTOR ACCEPTANCE CORPORATION	Case No. 2:22-cv-11405-TGB Hon. Terrence G. Berg JURY TRIAL DEMANDED
a/k/a NISSAN MOTOR ACCEPTANCE COMPANY LLC, Defendant.	JUKI IKIAL DEMANDED

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

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

DEFENDANTS' JOINT REPLY BRIEF IN SUPPORT OF THEIR MOTION TO REDUCE THE NUMBER OF ASSERTED CLAIMS

TABLE OF CONTENTS

Page

I.	INTF	RODUCTION	1
II.	FAC	TUAL BACKGROUND	1
III.	ARG	UMENT	2
	A.	Claim Reduction Should Occur Before Claim Construction	2
	B.	Federal Circuit Case Law Supports Defendants' Request	6
IV.	CON	CLUSION	7

DOCKET A L A R M



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.