

EXHIBIT I

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

IN RE NEO WIRELESS, LLC
PATENT LITIG.

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2:22-md-03034-TGB

HON. TERRENCE G. BERG

PLAINTIFF NEO WIRELESS, LLC’S INITIAL DISCLOSURES

Plaintiff Neo Wireless, LLC (“Neo”) serves its First Initial Disclosures pursuant to Federal Rule of Civil Procedure 26. Neo submits these disclosures based on information it has acquired to date, as it presently understands this information and the significance thereof, and without yet having had the benefit of formal discovery from Defendants Toyota Motor Corporation, Inc., Toyota Motor North America, Inc., Toyota Motor Sales, USA, Inc., Toyota Motor Engineering & Manufacturing North America, Inc., and Toyota Motor Credit Corporation (collectively, “Toyota”), FCA US, LLC (“FCA”), Ford Motor Company (“Ford”), General Motors Company and General Motors LLC (collectively, “GM”), American Honda Motor Co., Inc. and Honda Development & Manufacturing of America, LLC (collectively, “Honda”), Mercedes-Benz USA, LLC (“Mercedes”), Nissan North America Inc. and Nissan Motor Acceptance Corporation a/k/a Nissan Motor

Acceptance Company LLC (collectively, “Nissan”), Tesla Inc. (“Tesla”), and Volkswagen Group of America, Inc. and Volkswagen Group of America Chattanooga Operations, LLC (collectively, “VW”) (all collectively “Defendants”). Accordingly, Neo reserves the right to modify, amend, retract, and/or supplement these disclosures as additional evidence and information becomes available.

Any contact with Neo personnel should be Neo’s counsel. These disclosures are made without any admission concerning the relevance, admissibility, or discoverability of particular documents or information for any specific purpose, and without waiver of any attorney-client privilege, work product immunity, or any other privilege or immunity from discovery.

Initial Disclosures

A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Pursuant to Rule 26(a)(1)(A)(i), and subject to the reservations stated above, the following persons are likely to have discoverable information that Neo may use to support its claims and/or defenses in this action. By making these disclosures, Neo does not represent that it has identified every witness possibly relevant to this action. The attribution of particular knowledge to each individual is not necessarily all-

inclusive, and each individual may have relevant information in other areas as well. Any contact with Plaintiff or Neo personnel should be through counsel for Plaintiff. The information herein is provided without any admission concerning the relevance, admissibility, or discoverability of particular documents or information for any specific purpose, and without waiver of any attorney-client privilege, work product immunity, or any other privilege or immunity from discovery.

INDIVIDUAL OR ENTITY	CONTACT INFORMATION	SUBJECTS
Dr. Xiaodong (Alex) Li	May only be contacted through the offices of Caldwell Cassady & Curry, 2121 N Pearl St., Ste 1200, Dallas TX 75201 (214) 888-4848	Inventor of the Patents-in-Suit, with knowledge of the subject matter of those Patents, conception and reduction to practice, secondary considerations, and invalidity; co-founder of Neocific, Inc. and former governor of Waltical Solutions, Inc.
Dr. Titus Lo	May only be contacted through the offices of Caldwell Cassady & Curry, 2121 N Pearl St., Ste 1200, Dallas TX 75201 (214) 888-4848	Inventor of the Patents-in-Suit, with knowledge of the subject matter of those Patents, conception and reduction to practice, secondary considerations, and invalidity; founding employee of Neocific, Inc. and former agent

INDIVIDUAL OR ENTITY	CONTACT INFORMATION	SUBJECTS
		and governor of Waltical Solutions, Inc.
David Loo	May only be contacted through the offices of Caldwell Cassady & Curry, 2121 N Pearl St., Ste 1200, Dallas TX 75201 (214) 888-4848	Co-CEO of Neo Wireless, LLC, with knowledge of the Patents-in-Suit (including the subject matter, title and ownership, licensing, and value), Neo's history, negotiations involving the Patents-in-Suit, Neo's licensing practice, and various corporate matters.
William Marino	May only be contacted through the offices of Caldwell Cassady & Curry, 2121 N Pearl St., Ste 1200, Dallas TX 75201 (214) 888-4848	Co-CEO of Neo Wireless, LLC, with knowledge of Neo's history, negotiations involving the Patents-in-Suit, Neo's licensing practice, valuation of the patents-in-suit, and various corporate matters.
Dr. Kemin Li	Unknown	Inventor of the Patents-in-Suit, with knowledge of the subject matter of those Patents, conception and reduction to practice, secondary considerations, and invalidity
Dr. Haiming Huang	Unknown	Inventor of the Patents-in-Suit, with knowledge of the subject matter of

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