

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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FORD MOTOR COMPANY, GENERAL MOTORS LLC,  
NISSAN NORTH AMERICA, INC., TESLA, INC., and  
AMERICAN HONDA MOTOR CO., INC.,<sup>1</sup>  
Petitioners,

v.

NEO WIRELESS, LLC,  
Patent Owner.

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IPR2022-01539  
Patent 10,965,512 B2

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**JOINT MOTION TO TERMINATE  
PURSUANT TO 35 U.S.C. § 317 AND 37 C.F.R. § 42.74**

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<sup>1</sup> Ford Motor Company filed a motion for joinder and a petition in IPR2023-00764, and General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., filed their own motion for joinder and petition in IPR2023-00961. Both motions were granted, and, therefore, Ford Motor Company, General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc., have been joined as petitioners in this proceeding.

## EXHIBIT LIST

2001	Declaration of William P. Alberth, Jr. [Alberth-Decl.]
2002	William P. Alberth, Jr. Curriculum Vitae [Alberth-CV]
2003	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Joint Claim Construction Statement [Joint-CC-Statement]
2004	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Exhibit A - Agreed Litigation Terms [Agreed-Lit.-Terms]
2005	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Exhibit B - Disputed Litigation Terms [Disputed-Lit.-Terms]
2006	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, Notice of Stipulation Regarding Claim Construction [Stip-Re-CC]
2007	Reserved
2008	Reserved
2009	In re Neo Wireless, LLC Patent Litigation, 2:22-MD-03034-TGB, ECF No. 84 [Dkt. 84]
2010	Second Declaration of William P. Alberth, Jr. [Alberth-2 <sup>nd</sup> -Decl.]
2011	Deposition of Paul Min, Ph.D. [Min-Depo.]
2012-2029	Reserved
2030	<i>Pro Hac Vice</i> Declaration of Xu Zhou [Zhou-PHV-Decl.]
2031-2099	Reserved

2100	Neo-Mercedes Settlement Agreement [Confidential] [Filed Filing Party and Board Only]
2101	Stipulation between Neo Wireless LLC and Remaining Petitioners

## STATEMENT OF RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317(a) and 37 C.F.R. § 42.74, all parties to this proceeding, namely Petitioners Ford Motor Company, General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc. (collectively “Petitioners”) and Patent Owner Neo Wireless LLC (“Neo”) jointly request termination of this proceeding with respect to Petitioners as a result of a Stipulation by Petitioners and Neo that resolves all pending disputes between Petitioners and Neo with respect to U.S. Patent. No. 10,965,512 (“’512 Patent”). A copy of the stipulation is filed concurrently herewith as Exhibit 2101.

Granting this motion will result in termination of the proceeding in its entirety, as Petitioners and Neo constitute all remaining parties in this matter. The Board has already terminated this case with respect to its original lead petitioner, Volkswagen Group of America, Inc. *See* Paper 49. The Board authorized filing of this Joint Motion via email on January 23, 2024.

## STATEMENT OF FACTS

On March 29, 2022, Neo asserted the ’512 Patent against parties Volkswagen Group of America, Inc., Ford Motor Company, General Motors LLC, Nissan North America, Inc., Tesla, Inc., and American Honda Motor Co., Inc. in actions entitled *Neo Wireless LLC v. Volkswagen Group of America, Inc. et al.*, Case No. 1:22-cv-00076 (E.D. Tex.); *Neo Wireless LLC v. General Motors Co et*

*al*, Case No. 2:22-cv-00094 (E.D. Tex.); *Neo Wireless LLC v. Tesla, Inc.*, Case No. 2:22-cv-00095 (E.D. Tex.); *Neo Wireless LLC v. Nissan North America Inc. et al*, Case No. 3:22-cv-00220 (M.D. Tenn.); *Neo Wireless LLC v. American Honda Motor Co., Inc.*, Case No. 2:22-cv-01824 (S.D. Ohio); *Neo Wireless LLC v. Ford Motor Company*, Case No. 4:22-cv-00210 (W.D. Mo).

All of the aforementioned matters were conditionally transferred to the Eastern District of Michigan for consolidated pretrial proceedings, as part of a multi-district litigation, in actions entitled *In re Neo Wireless LLC Patent Litig.*, Case No. 2:22-md-03034 (E.D. Mich.), *Neo Wireless, LLC v. Volkswagen Group of America, Inc. et al.*, Case No. 2:22-cv-11404 (E.D. Mich.), *Neo Wireless LLC v. General Motors Co et al*, Case No. 2:22-cv-11407 (E.D. Mich.), *Neo Wireless LLC v. Tesla, Inc.*, Case No. 2:22-cv-11408 (E.D. Mich.), *Neo Wireless LLC v. Nissan North America Inc. et al*, Case No. 2:22-cv-11405 (E.D. Mich.), *Neo Wireless LLC v. American Honda Motor Co., Inc.*, Case No. 2:22-cv-11403 (E.D. Mich.), *Neo Wireless LLC v. Ford Motor Company*, Case No. 2:22-cv-11402 (E.D. Mich.).

The original lead petitioner in this case, Volkswagen Group of America Inc. (“VW”), filed the instant petition (IPR2022-01539) for *inter partes* review of the ’512 Patent on September 15, 2022. The Board granted institution on May 2, 2023. Ford Motor Company (“Ford”) filed its petition for *inter partes* review of the ’512 Patent on March 28, 2023, along with a motion to join IPR2022-01539.

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