

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

FORD GLOBAL TECHNOLOGIES, LLC,

Plaintiff,

v.

**NEW WORLD INTERNATIONAL, INC.,
AUTO LIGHTHOUSE PLUS, LLC and
UNITED COMMERCE CENTERS, INC.,**

Defendants.

Case No. 3:17-cv-03201-N

NOTICE OF APPEAL

1. Pursuant to Rules 3 and 4 of the Federal Rules of Appellate Procedure, Plaintiff, Ford Global Technologies, LLC, files this Notice of Appeal.

2. The party taking the appeal is Plaintiff Ford Global Technologies, LLC.

3. The Judgment being appealed is the Judgment [Doc. # 374] signed and entered March 4, 2019.

4. Notice also is given that on December 21, 2018, Plaintiff Ford Global Technologies, LLC filed a Motion for a finding that this case is exceptional under 35 U.S.C. § 285 and for attorneys' fees and costs. [Doc. # 350.] This motion was filed post-trial and before judgment in accordance with the briefing schedule of Order of docket number 349.

5. Notice also is given that on December 21, 2018, Plaintiff Ford Global Technologies, LLC filed a motion for a permanent injunction, pre-judgment relief and post-

judgment interest. [Doc. # 352.] This motion was filed post-trial and before judgment in accordance with the briefing schedule of Order of docket number 349.

6. On April 1, 2019, Defendants New World International, Inc., Auto Lighthouse Plus, LLC, and United Commerce Centers, Inc. filed a Motion [Doc. # 378] seeking clarification of whether its post-trial motions remained pending after the Judgment [Doc. # 374] was signed and entered. The Judgment was in the form proposed by the parties, which was not identified as “final” and subject to the parties’ post-trial motions. Defendants contend there is an unlikely possibility that the Judgment [Doc. # 374] impliedly denied all post-trial motions.

7. Out of an abundance of caution and based on Defendants’ Motion [Doc. # 378], Plaintiff Ford Global Technologies, LLC files this notice of appeal prior to any order from the Court expressly resolving the post-trial motions. Pursuant to Federal Rule of Appellate Procedure 4(a)(4)(B)(ii), Plaintiff Ford Global Technologies, LLC shall amend this notice of appeal as appropriate.

8. This appeal is taken to the United States Court of Appeals for the Federal Circuit.

Date: April 3, 2019

Respectfully submitted,

/s/ Marc Lorelli

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CERTIFICATE OF ELECTRONIC SERVICE

On April 3, 2019, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or *pro se* parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5 (b)(2).

BROOKS KUSHMAN P.C.

/s/ Marc Lorelli
Marc Lorelli