

**IN UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

BELL NORTHERN RESEARCH, LLC,)
)
Plaintiff,)
)
v.)
)
HMD AMERICA, INC., HMD GLOBAL OY,)
SHENZHEN CHINO-E COMMUNICATION)
CO. LTD., HON HAI PRECISION INDUSTRY)
CO., LTD, TINNO MOBILE TECHNOLOGY)
CORP., SHENZHEN TINNO MOBILE CO.,)
LTD., TINNO USA, INC., UNISOC)
TECHNOLOGIES CO. LTD., SPREADTRUM)
COMMUNICATIONS USA, INC., WINGTECH)
TECHNOLOGY CO. LTD., WINGTECH)
INTERNATIONAL, INC., HUAQIN CO. LTD.,)
BEST BUY CO., INC., BEST BUY STORES)
L.P., TARGET CORP., WALMART INC.,)
)
Defendants.)
)

Case No. 1:22-cv-22706-RNS

**DEFENDANTS UNISOC TECHNOLOGIES CO. LTD.’S, SPREADTRUM
COMMUNICATIONS USA, INC.’S, AND HON HAI PRECISION
INDUSTRY CO., LTD.’S MOTION TO EXTEND TIME TO
FILE JOINT-DISCOVERY-PLAN-AND-CONFERENCE REPORT**

Defendants, Unisoc (Shanghai) Technologies Co., Ltd. (“Unisoc”), Spreadtrum Communications USA Inc. (“Spreadtrum”), and Hon Hai Precision Industry Co., Ltd. (“Hon Hai”) (collectively “Defendants”), through their undersigned counsel, move for an extension of time to file a joint-discovery-plan-and-conference report required by Federal Rule of Civil Procedure 26(f)(3) and Local Rule 16.1(b)(2), until one week after the Court rules on Defendants’ Motion to Stay (ECF No. 115).

A joint-discovery-plan-and-conference report is due on January 23, 2023. Good cause exists for this extension because Defendants filed a Motion to Stay Discovery and Other

Deadlines (ECF No. 115) on January 18, 2023, seeking to stay discovery and all other deadlines as to Unisoc, Spreadtrum, and Hon Hai until this Court rules on Defendants' motions to dismiss for lack of personal jurisdiction¹ (ECF Nos. 78, 91). As explained therein (ECF No. 115), Defendants' motions to dismiss (ECF Nos. 78, 91) are meritorious and case dispositive as to Unisoc, Spreadtrum, and Hon Hai, warranting a stay. Given the meritorious jurisdictional issues raised, along with the pending motion to stay as to Defendants, an extension would preserve judicial and party resources that would be otherwise expended unnecessarily. Accordingly, Defendants request an extension to file a joint-discovery-plan-and-conference report until one week after the Court rules on Defendants' Motion to Stay (ECF No. 115).

Defendants' counsel conferred with Plaintiff's counsel on January 18, 2023. Plaintiff opposes the Motion. Defendants' counsel conferred with counsel for defendants HMD America, Inc., HMD Global Oy, Tinno Mobile Technology Corp., Shenzhen Tinno Mobile Co., Ltd., Tinno USA, Inc., Wingtech Technology Co. Ltd., Wingtech International, Inc., Best Buy Co., Inc., Best Buy Stores L.P., Target Corp., and Walmart Inc. on January 18, 2023, who advised that they do not oppose the relief requested herein.

Dated January 19, 2023.

Respectfully submitted,

/s/ Lisa K. Nguyen

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¹ Unisoc's and Spreadtrum's Motion to dismiss also seeks to dismiss the complaint under Federal Rule of Civil Procedure 12(b)(3) and 12(b)(6).

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