

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

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

BELL NORTHERN RESEARCH, LLC,

Plaintiff

v.

JURY TRIAL DEMANDED

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.; BEST BUY CO., INC.; BEST BUY
STORES L.P.; TARGET CORP.; WALMART
INC.

Defendants.

**PLAINTIFF BELL NORTHERN RESEARCH LLC'S UNOPPOSED MOTION TO
DISMISS WITHOUT PREJUDICE DEFENDANTS HON HAI PRECISION INDUSTRY
CO. LTD AND SPREADTRUM COMMUNICATIONS USA, INC.**

Plaintiff Bell Northern Research, LLC, pursuant to Fed. R. Civ. P. 41(a)(2), hereby moves this Honorable Court to grant Plaintiff's motion for an order dismissing all claims in this action asserted against Defendants Hon Hai Precision Industry Co., Ltd. and Spreadtrum Communications USA, Inc. without prejudice. Plaintiff submits that Defendants Hon Hai Precision Industry Co., Ltd. and Spreadtrum Communications USA, Inc. have not pleaded any counterclaims, and that the terms of this dismissal without prejudice are proper. Counsel for

Plaintiff conferred with counsel for Defendants Hon Hai Precision Industry Co., Ltd. and Spreadtrum Communications USA, Inc. who indicated that they did not oppose this motion.

Each Party to this case shall bear its own costs, expenses, and attorneys' fees. A proposed order of dismissal accompanies this Unopposed Motion to Dismiss.

Respectfully submitted,

Dated: January 31, 2023

/s/ Paul Richter

Paul Richter (admitted *pro hac vice*)

prichter@devlinlawfirm.com

Christopher Clayton (admitted *pro hac vice*)

cclayton@devlinlawfirm.com

Adam Woodward

awoodward@devlinlawfirm.com

Florida Bar No. 1029147

DEVLIN LAW FIRM LLC

1526 Gilpin Avenue

Wilmington, Delaware 19806

Telephone: (302) 449-9010

Facsimile: (302) 353-4251

Jose I. Rojas

Florida Bar No. 331546

jrojas@rojaslawfirm.com

Alexander F. Rojas

Florida Bar No. 124232

arojas@rojaslawfirm.com

ROJASLAW

201 S. Biscayne Blvd., 28th Floor

Miami, FL 33131

Telephone: (305) 446-4000

Facsimile: (305) 985-4146

*Attorneys for Plaintiff Bell Northern
Research, LLC*

CERTIFICATION OF PRE-FILING CONFERENCE

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel for Plaintiff Bell Northern Research, LLC certifies that Plaintiff's counsel conferred with counsel for Defendants Hon Hai Precision Industry Co. and Spreadtrum Communications USA, Inc. telephonically regarding the issues raised in this Motion. Counsel for Defendants indicated that they did not oppose the Motion.

/s/ Paul Richter
Paul Richter

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who have consented to electronic service are being served with a copy of this document on January 31, 2023.

/s/ Paul Richter
Paul Richter