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.

_____/

DECLARATION OF CHRISTOPHER CLAYTON IN SUPPORT OF BELL NORTHERN
RESEARCH LLC'S OPPOSITION TO DEFENDANT UNISOC TECHNOLOGIES CO.,
LTD.'S MOTION TO DISMISS

I, Christopher Clayton, declare as follows:

1.   I am an attorney licensed to practice law in the state and federal courts of

Missouri. I am an associate with the Devlin Law Firm LLC, and counsel of record for Plaintiff

Bell Northern Research LLC ("Plaintiff") in the above-entitled action. I have personal

knowledge of the matters set forth herein and if called, I could competently testify thereto.

2.   I make this declaration in support of Plaintiff's Opposition to Defendant Unisoc

Technologies Co. Ltd.'s Motion to Dismiss such that the Exhibit referenced herein is attached to

this declaration and herewith incorporated into Plaintiff's Opposition to the aforementioned Motion to Dismiss.

3.   Attached as Exhibit A on pages 001–004 is a true and correct copy of a public webpage for the Unisoc T610 obtained from the website www.unisoc.com.

4.   Attached as Exhibit A on page 005 is a true and correct copy of a public webpage for the Nokia T20 obtained from the website www.nokia.com that is linked to the Unisoc website above in paragraph 3.

5.   Attached as Exhibit A on pages 006–007 are true and correct copies of public webpages for the Nokia T20 with a platform containing the Unisoc T610 obtained from the website www.bestbuy.com and showing that the Best Buy Miami Beach store where the Nokia T20 may be ordered and picked up is located at 1131 5th St., Miami Beach, FL 33139.

6.   Attached as Exhibit A on page 008 is a true and correct copy of a public webpage for the Nokia 225 4G with a platform containing the Unisoc T117.

7.   Attached as Exhibit A on page 009 are true and correct copies of public webpages for the Nokia 225 4G with an operating system containing the Unisoc T117 obtained from the website www.bestbuy.com showing that the Nokia 225 4G may be ordered and picked up at the same store as in paragraph 5 above.

8.   Attached as Exhibit A on pages 010–011 is a true and correct copy of a public webpage for the Unisoc SC7731E.

9.   Attached as Exhibit A on page 012 is a true and correct copy of a public webpage for the Nokia C10 with a platform containing the Unisoc SC7731E.

10.   Attached as Exhibit A on pages 013–015 is a true and correct copy of a public webpage for the Unisoc SC9863A.

11.   Attached as Exhibit A on page 016 is a true and correct copy of a public webpage for the Nokia C20 with a platform containing the Unisoc SC9863A.

12.   Attached as Exhibit A on page 017 is a true and correct copy of a public webpage for the Nokia C21 with a platform containing the Unisoc SC9863A.

13.   Attached as Exhibit A on pages 018–020 is a true and correct copy of a public webpage for the Unisoc T606.

14.   Attached as Exhibit A on page 021 is a true and correct copy of a public webpage for the Nokia G11 Plus with a platform containing the Unisoc T606.

15.   Attached as Exhibit A on page 022 is a true and correct copy of a public webpage for the Nokia G21 with a platform containing the Unisoc T606.

16.   Attached as Exhibit A on page 023 is a true and correct copy of a public webpage for the Nokia T10 with a platform containing the Unisoc T606.
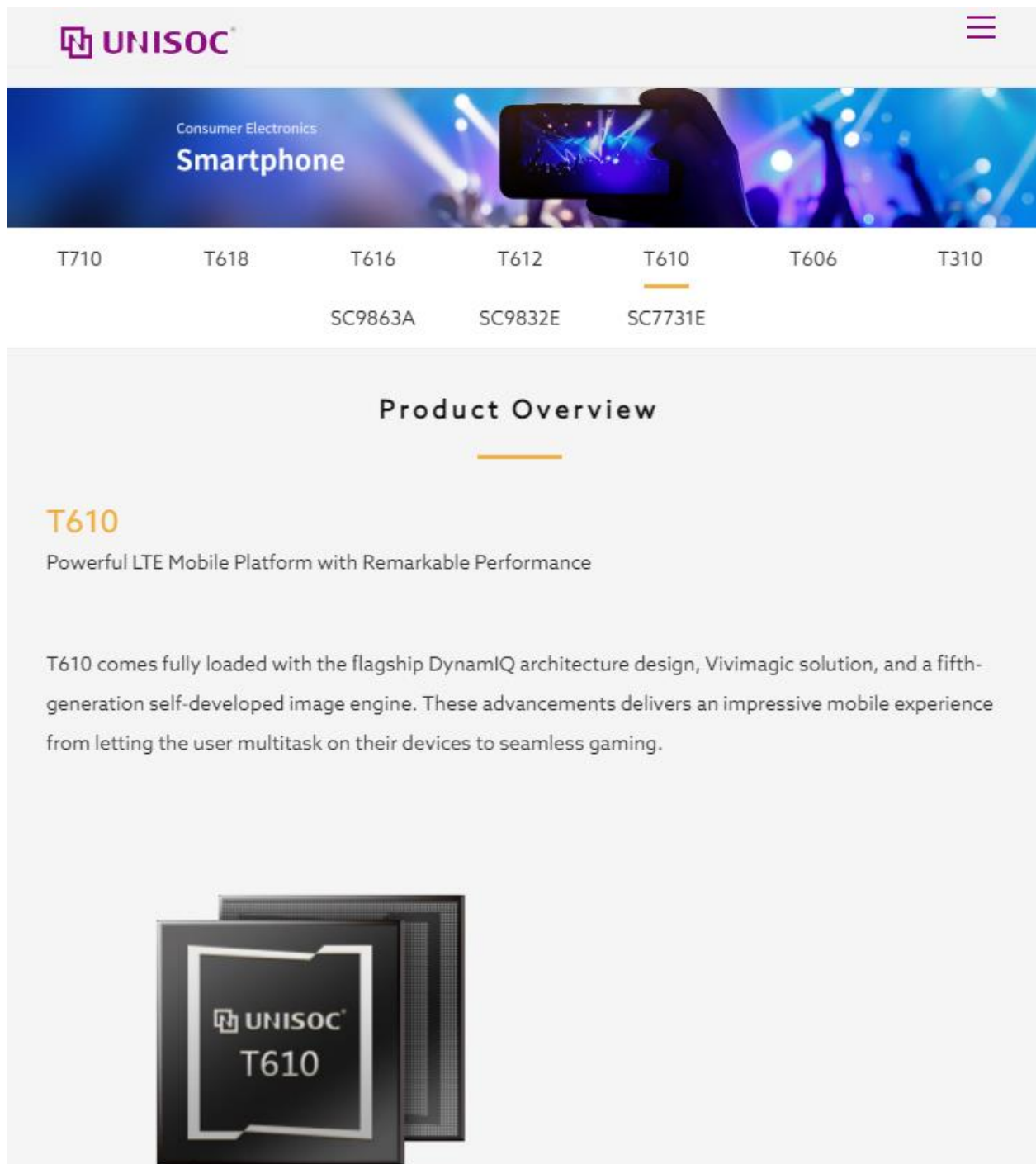
17.   Attached as a Exhibit A on page 024 is a true and correct copy of a public webpage for the Nokia T10 obtained from the website www.walmart.com and showing that the Walmart Miami Supercenter store where the Nokia T10 may be ordered and picked up is located at 3200 NW 79th St., Miami, FL 33147.

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

Executed this 31st day of January, 2023,

/s/ Christopher Clayton
Christopher Clayton

EXHIBIT A

Source: https://www.unisoc.com/en_us/home/TZNSJ-T610-4-2 (last visited Jan. 31, 2023)

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