

**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

**DEFENDANT UNISOC TECHNOLOGIES CO. LTD.'S
REPLY BRIEF IN SUPPORT OF ITS MOTION TO DISMISS**

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I. THE COURT LACKS PERSONAL JURISDICTION OVER UNISOC

All that Plaintiff was able to amass for specific jurisdiction over Unisoc¹ comes down to 1) webpages listing several Unisoc chipsets; and 2) that some other company's products found in the United States apparently contain Unisoc chipsets. ECF No. 127 at 3-7 ("Opp."). Then, without any further support, Plaintiff states that "there is *no doubt* that Unisoc introduces infringing products into the stream of commerce within the United States." Opp. at 3 (emphasis added). But personal jurisdiction requires more than pure conjecture. *See, e.g., World-Wide Volkswagen Corp. v. Woodson*, 444 U.S. 286, 298 (1980) (holding that exercise of specific jurisdiction requires showing that the defendant placed the accused products into the "stream of commerce with the expectation that they will be purchased by consumers in the forum State" where expectation requires more than mere "foreseeab[ility]"); *In re Takata Airbag Prod. Liab. Litig.*, 396 F. Supp. 3d 1101, 1155 (S.D. Fla. 2019) ("[S]pecific jurisdiction under the stream of commerce theory will not be sustained upon unspecific and generalized allegations."). Neither the Complaint nor Plaintiff's opposition brief identifies the requisite contacts with the forum.

The "substantial connection" with the forum "necessary for a finding of minimum contacts must come about by *an action of the defendant purposefully directed toward the forum State.*" *Asahi Metal Indus. Co. v. Superior Ct. of California, Solano Cnty.*, 480 U.S. 102, 112 (1987) (citing *Burger King Corp. v. Rudzewicz*, 471 U.S. 462, 476 (1985)). Plaintiff, however, fails to identify any Unisoc activity purposefully directed toward Florida or the United States. Instead, Plaintiff cites a Unisoc website that simply acknowledges its products are "sold on a global scale." Opp. at 5. Nor is it significant that the Unisoc website links to the Nokia T20 as a product example—the Nokia T20 is sold globally.² None of this shows Unisoc directing anything toward

¹ Plaintiff does not assert general personal jurisdiction over Unisoc.

² *See, e.g.,* https://www.nokia.com/phones/en_int/nokia-t-20?sku=F20RID1A001 at n.3.

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