

**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 AND TINNO MOBILE
TECHNOLOGY CORP., SHENZHEN TINNO MOBILE CO. LTD., AND TINNO USA,
INC.'S JOINT MOTION TO STAY ALL DEADLINES**

Plaintiff Bell Northern Research, LLC (“BNR”) and Defendants Tinno Mobile Technology Corp, Shenzhen Tinno Mobile Co., Ltd., and Tinno USA, Inc. (collectively, “Tinno”) have reached an agreement. BNR and Tinno (the “Parties”) expect to jointly file a dismissal without prejudice in approximately the next three weeks. Accordingly, the Parties respectfully request the Court stay all pending deadlines between them up to and including March 24, 2023. The Parties request this stay, not for purposes of any delay, but so that they may finalize and file dismissal papers without incurring additional expenses.

Dated: March 2, 2023

Respectfully submitted,

/s/ Paul Richter

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Co. Ltd., Tinno USA, Inc.*

CERTIFICATION OF PRE-FILING CONFERENCE

Pursuant to Local Rule 7.1(a)(3), the undersigned counsel for Bell Semic and Tinno certify that counsel conferred on March 1, 2023 on all of the issues raised in this motion with counsel for: HMD America, Inc., HMD Global Oy (collectively, “HMD”), Wingtech Technology Co. Ltd., Wingtech International, Inc. (collectively, “Wingtech”), Best Buy Co., Inc., Best Buy Stores L.P. (collectively, “Best Buy”), Target Corp. (“Target”), and Walmart Inc. (“Walmart”).

Counsel for HMD, Target, Best Buy, and Walmart indicated they do not oppose the motion, “so long as BNR will not use the absence of Tinno from discovery or the case to prejudice the other defendants.” Counsel for Wingtech indicated that they do not oppose the motion.

The movants have conferred with all parties or non-parties who may be affected by the relief requested.

/s/ Paul Richter
Paul Richter

/s/ Jason Xu
Jason Xu

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 March 2, 2023.

/s/ Jose I. Rojas
Jose I. Rojas