

**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.; TINNO MOBILE
TECHNOLOGY CORP.; SHENZHEN
TINNO MOBILE CO., LTD.; TINNO USA,
INC.; UNISOC TECHNOLOGIES CO., LTD.;
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 TINNO MOBILE TECHNOLOGY
CORP., SHENZHEN TINNO MOBILE CO., LTD., AND TINNO USA, INC.**

Plaintiff Bell Northern Research, LLC (“BNR” or “Plaintiff”), pursuant to Fed. R. Civ. P. 41(a)(2), hereby moves this Honorable Court to grant its motion for an order dismissing all claims in this action asserted against Defendants Tinno Mobile Technology Corp., Shenzhen Tinno Mobile Co., Ltd., and Tinno USA, Inc. (“Defendant” or “Tinno”) without prejudice. BNR submits that Tinno has not pleaded any counterclaims, and that the terms of this dismissal without prejudice are proper in that BNR and Tinno have reached an agreement. Each Party to this case shall bear its own costs, expenses, and attorneys’ fees. A proposed order of dismissal accompanies this motion.

Dated: March 24, 2023

Respectfully submitted,

/s/ Paul Richter

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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 on March 22–23, 2023 on all of the issues raised in this motion with counsel for all of the Defendants in this action that have entered an appearance, namely: HMD America, Inc., HMD Global Oy (collectively, "HMD"), Tinno Mobile Technology Corp., Shenzehn Tinno Mobile Co., Ltd., Tinno USA, Inc. (collectively, "Tinno"), 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, and Best Buy indicated they do not oppose this motion "so long as BNR will not use the absence of Tinno from discovery or the case to prejudice the other defendants HMD, Target, and Best Buy[.]" Counsel for Walmart indicated that they will not oppose the motion with the same understanding. Counsel for Wingtech indicated that it does not oppose. Counsel for Tinno indicated that it does not oppose.

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

/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 March 24, 2023.

/s/ Paul Richter
Paul Richter