

# Exhibit A

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

BELL NORTHERN RESEARCH, LLC,

Plaintiff,

v.

HMD AMERICA, INC., HMD GLOBAL OY,  
SHENZHEN CHIINO-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

**DECLARATION OF THEODORE ANGELIS IN SUPPORT OF HON HAI PRECISION  
INDUSTRY CO., LTD'S MOTION FOR EXCEPTIONAL CASE STATUS**

I, Theodore Angelis, submit the following declaration in support of Hon Hai Precision Industry Co., LTD's ("Hon Hai") Motion for Exceptional Case Status:

1. I am more than eighteen (18) years of age. I am fully competent to make this declaration. I have personal knowledge of the facts below, and would testify to such facts under oath if asked to do so.

2. As a partner with the law firm K&L Gates LLP, I represented Hon Hai Precision Industry Co., Ltd. ("Hon Hai") in the previous lawsuit on the same patents, i.e., *Bell Northern*

*Research, LLC v. HMD America, Inc., et al.*, No. 22-cv-21035. On May 10, 2022 at 11:11 PM, I contacted Bell Northern Research LLC (“BNR”) by sending an email to Paul Richter (prichter@devlinlawfirm.com) to request a teleconference, believing that BNR might drop Hon Hai from the lawsuit if it understood that Hon Hai does not manufacture Nokia phones or tablets. On May 11, 2022, I spoke with Paul Richter for the first time.

3. During the teleconference on May 11, 2022, I informed Mr. Richter that Hon Hai does not manufacture Nokia phones or tablets. Mr. Richter asked me to provide an email explaining that Hon Hai does not manufacture the accused Nokia devices (made by HMD). During the call, BNR did not refute that fact or provide an explanation for the allegations against Hon Hai. On May 12, 2022 at 2:06 PM, I sent the requested email to Paul Richter proposing the dismissal of Hon Hai without prejudice on the basis that it does not manufacture the accused devices.

4. On June 27, 2022 at 5:13 PM, I sent an email to Paul Richter and Chris Clayton (cclayton@devlinlawfirm.com) reiterating that Hon Hai does not manufacture the accused devices and should be dismissed. BNR did not respond to that email.


5. On August 10, 2022, I followed up on the previous email by sending another email to Paul Richter and Chris Clayton, stating that Hon Hai does not manufacture the accused devices and should be dismissed.

6. On August 12, 2022, I spoke with Paul Richter by teleconference, stating that Hon Hai should be dismissed because it does not manufacture the accused devices. Mr. Richter did not refute that fact or provide an explanation for the allegations against Hon Hai..

7. On August 23, 2022 at 1:00 PM, I spoke with Paul Richter by teleconference, providing further detail on the need for dismissal of Hon Hai because it does not manufacture the

accused devices. Mr. Richter did not refute that fact or provide an explanation for the allegations against Hon Hai..

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 29, 2023 in Seattle, Washington.

  
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Theo Angelis