

# Exhibit B

**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 LISA K. NGUYEN IN SUPPORT OF  
HON HAI PRECISION INDUSTRY CO., LTD'S  
MOTION FOR EXCEPTIONAL CASE STATUS**

I, Lisa K. Nguyen, 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. I am a partner with the law firm Allen & Overy LLP, and I represent Hon Hai in this matter. I have reviewed the complaint in this case, and oversaw the investigation into the allegations therein. Based on the facts identified in that investigation, which are set forth in Hon Hai's Motion to Dismiss Based on Lack of Personal Jurisdiction (Dkt. No. 78), Allen & Overy LLP determined that the Southern District of Florida lacked personal jurisdiction over Hon Hai. On September 30, 2022, I requested a meet and confer with Bell Northern Research ("BNR") to discuss whether BNR would dismiss Hon Hai without motion practice.

3. On October 3, 2022 at approximately 1:00 p.m. ET, I met and conferred with Christopher Clayton and Jose Rojas, counsel for BNR, via Microsoft Teams meeting. I described Hon Hai's business and lack of presence in Florida. Specifically, I stated that Hon Hai does not do business in Florida. I further stated that Hon Hai sells parts and services to FIH Mobile, not to Nokia. Counsel for BNR asked whether any forum in the United States had jurisdiction over Hon Hai. I responded that Hon Hai has an office located in California.

4. It is my typical practice to offer to provide documentation establishing no personal jurisdiction in the forum before filing a motion to dismiss. Consistent with that practice, during the October 3 meet and confer with counsel for BNR, I offered to provide documentation to BNR substantiating that Hon Hai has no relationship with Nokia, and that there is no personal jurisdiction over Hon Hai in Florida. Further, I stated that Hon Hai would be open to discussing these issues at any time before or even after we filed a motion to dismiss to avoid the expense to the parties and the Court.

5. Counsel for BNR did not refute any facts that I provided during the call. Nor did counsel for BNR provide any explanation for the allegations against Hon Hai or the basis for jurisdiction. Counsel for BNR stated that it would wait to see Hon Hai's motion papers.

6. Approximately one hour after the meet and confer concluded, I emailed my colleagues with a summary of the meet and confer. A true and correct copy of that email is attached as Exhibit C.

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 28, 2023 in Palo Alto, CA.



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Lisa K. Nguyen