

EXHIBIT 8

**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.

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.,

JURY TRIAL DEMANDED

Defendants.

**DECLARATION OF CHRISTOPHER CLAYTON IN SUPPORT OF BELL NORTHERN
RESEARCH LLC'S OPPOSITION TO DEFENDANT HON HAI PRECISION
INDUSTRY CO., LTD'S MOTION FOR EXCEPTIONAL CASE STATUS**

I, Christopher Clayton, declare as follows:

1. I am an attorney licensed to practice law and a member of good standing of the Missouri State Bar and the Illinois State Bar. I am an associate with the Devlin Law Firm LLC, and counsel of record for Plaintiff Bell Northern Research LLC ("Plaintiff") in the above-entitled action. I have personal knowledge of the matters set forth herein and if called, I could competently testify thereto.

2. I make this declaration in support of Plaintiff's Opposition to Defendant Hon Hai Precision Industry Co., Ltd's Motion for Exceptional Case Status.

3. On October 3, 2022, I, along with co-counsel Jose I. Rojas, participated in a meet and confer with counsel for Hon Hai Precision Industry Co., Ltd., Lisa K. Nguyen.

4. At the outset of the meet and confer, I conveyed that BNR was open to hearing Hon Hai's position and receiving any information about Hon Hai's intended motion to dismiss.

5. Counsel for Hon Hai indicated that Hon Hai did not sell to Nokia, but did sell to Foxconn International Holdings Mobile.

6. Counsel for Hon Hai conveyed that Hon Hai had an office in California.

7. I requested a draft of Hon Hai's motion.

8. Counsel for Hon Hai provided a non-committal response and that Hon Hai intended to file its motion on October 24, 2022.

9. In response to Hon Hai's counsel, I indicated that we would see Hon Hai's motion papers after filing.

10. I was involved in conducting a pre-suit investigation regarding the defendants of this case including Hon Hai and reviewed the following public websites prior to BNR filing its first case against Hon Hai:

<https://asia.nikkei.com/Business/Nokia-brand-returns-under-Foxconn;>

<https://www.cdrinfo.com/d7/content/nokia-phones-reborn-india-next-year-hon-hai-manufacture-them;>

<https://www.prnewswire.com/news-releases/hmd-global-founded-to-create-new-generation-of-nokia-branded-mobile-phones-and-tablets-579916811.html>

[https://www.foxconn.com/en-us/about/worldwide.](https://www.foxconn.com/en-us/about/worldwide)

I declare under penalty of perjury under the laws of the United States the foregoing is true and correct.

Executed this 5th day of May, 2023,

/s/ Christopher Clayton

Christopher Clayton