

# EXHIBIT 9

**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.

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

I, Jose I. Rojas, declare as follows:

1. I am an attorney licensed to practice law and a member of good standing of the Florida Bar. I am managing partner of ROJASLAW, and counsel of record for Plaintiff Bell Northern Research LLC ("BNR") in the above-referenced 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 ("Hon Hai") Motion for Exceptional Case Status.

3. On October 3, 2022, I, along with co-counsel Christopher Clayton, 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, Mr. Clayton 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. Mr. Clayton 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, Mr. Clayton indicated that we would see Hon Hai's motion papers after filing.

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

Executed this 5<sup>th</sup> day of May, 2023,

/s/ Jose I. Rojas  
Jose I. Rojas