

**UNITED STATES DISTRICT COURT
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., WINGTECH TECHNOLOGY
CO., LTD., WINGTECH
INTERNATIONAL, INC., BEST BUY CO.,
INC., BEST BUY STORES L.P., TARGET
CORP., and WALMART INC.,

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO SERVE NON- INFRINGEMENT, UNENFORCEABILITY, AND INVALIDITY
CONTENTIONS, AND MAKE ACCOMPANYING DOCUMENT PRODUCTION**

Defendants, WINGTECH TECHNOLOGY CO., LTD. and WINGTECH INTERNATIONAL, INC. (“WINGTECH” or “Defendants”), by and through its undersigned counsel and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, hereby file this unopposed motion for extension of time and respectfully move the Court for an extension of the deadline to serve Non-Infringement, Unenforceability, and Invalidity Contentions and make accompanying document production under Amended Scheduling Order (ECF No. 174). In support thereof, the Defendant state as follows:

1. Under the Amended Scheduling Order (ECF No. 174), the current deadline to serve Non-Infringement, Unenforceability, and Invalidity Contentions and make accompanying

document production is June 9, 2023.

2. WINGTECH has engaged new counsel who requires additional time to review the complaint, patents, and other relevant documents in this action as well as time to meet with the Plaintiff regarding possible resolution of this dispute.

3. Undersigned counsel therefore respectfully requests a twenty one-day (21) extension of time up to and including Friday, June 30, 2023, in order to properly prepare and serve Non-Infringement, Unenforceability, and Invalidity Contentions and make accompanying document production.

4. This motion is made in a good faith and not in effort to prejudice any party or delay this matter.

WHEREFORE, Defendants, WINGTECH, respectfully request a 21-day extension of time through Friday, June 30, 2023 in order to serve Non-Infringement, Unenforceability, and Invalidity Contentions and make accompanying document production, and for such other and further relief this Court deems just and proper.

Local Rule 7.1(a)(3) Certificate

Counsel for Wingtech certifies that they have conferred with all parties or non-parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in the motion. Counsel for the Plaintiff, Christopher Clayton, has indicated that Plaintiff does not oppose the relief sought herein.

Date: June 9, 2023

Respectfully submitted,

/s/ Andrew Jay Fuller, Esq.

ANDREW J. FULLER, ESQ.

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*Attorneys for Defendants Wingtech Technology Co., Ltd.
and Wingtech International, Inc.*

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that on this 9th day of June, 2023, I electronically filed the foregoing with the Clerk of Court of the United States District Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record appearing on the Certificate of Service generated by the ECF system.

/s/ Andrew J. Fuller, Esquire _____

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*Co-Counsel for Defendants Wingtech Technology Co.,
Ltd. and Wingtech International, Inc.*