

**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.

**PLAINTIFF BELL NORTHERN RESEARCH, LLC AND DEFENDANTS WINGTECH
TECHNOLOGY CO., LTD. AND WINGTECH INTERNATIONAL, INC.'S JOINT
MOTION TO STAY ALL DEADLINES FOR DEFENDANTS WINGTECH
TECHNOLOGY CO., LTD. AND WINGTECH INTERNATIONAL, INC.**

Plaintiff Bell Northern Research, LLC and Defendants Wingtech Technology Co., Ltd. and Wingtech International, Inc. (together, "Wingtech"), by and through their undersigned counsel, move for entry of a stay of all deadlines for Wingtech. In support thereof, Plaintiff and Wingtech state as follows:

1. Plaintiff and Wingtech have reached an agreement in principle to resolve their dispute. In order to preserve time and resources, Plaintiff and Wingtech respectfully move for all deadlines for Wingtech and for Plaintiff with respect to Wingtech in this matter to be stayed for 14 days, up to and including July 28, 2023, so that Plaintiff and Wingtech may draft and execute the necessary settlement agreements.

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

this matter. This motion does not seek to stay any deadlines affecting any defendants other than Wingtech.

WHEREFORE, Plaintiff and Wingtech respectfully request that all deadlines for Wingtech and for Plaintiff with respect to Wingtech be stayed for 14 days, up to and including July 28, 2023, 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. Plaintiff, through its Counsel, Christopher Clayton and Paul Richter, has agreed to move jointly with Wingtech for the relief requested herein.

Date: July 14, 2023

Respectfully submitted,

/s/ Andrew Jay Fuller, Esq.

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*Counsel for Defendants Wingtech Technology Co., Ltd.
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/s/ Jose I. Rojas, Esq.

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Counsel for Plaintiff Bell Northern Research, LLC

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 14th day of July, 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, Esq. _____

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NELSON MULLINS RILEY & SCARBOROUGH LLP

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