

**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., 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.

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**NOTICE OF INTENT TO FILE OPPOSITION TO PLAINTIFF'S MOTION FOR  
ALTERNATIVE SERVICE**

Defendant Huaqin Co. Ltd., through undersigned counsel, hereby files this notice that it intends to submit a response in opposition to Plaintiff Bell Northern Research, LLC's ("BNR") motion for leave to effect alternative service (ECF No. 71) within the timeframe applicable under the Local Rules (or as otherwise ordered by the Court). Huaqin files this notice in an abundance of caution because on a prior occasion, in a related case that BNR later dismissed, BNR filed an *ex parte* motion for alternative service regarding Huaqin that was granted and that, we submit, failed to properly set out grounds for alternative service where, as here, the defendant is located in

a country that has signed onto the Hague Service Convention. *See Bell Northern Research, LLC v. hmd America, Inc.*, Case No. 22-cv-21035-RNS (S. D. Fla.) (ECF Nos. 44, 45).

As a result, Huaqin intends to file an opposition to the motion for alternative service and it respectfully requests that the Court not rule on the Plaintiff's motion until Huaqin has filed its response in opposition within the timeframe permitted under the Local Rules.

Date: November 21, 2022

Respectfully Submitted,

**MARCUS NEIMAN  
RASHBAUM & PINEIRO LLP**

By: /s/ Michael A. Pineiro  
Michael A. Pineiro  
Fla. Bar No. 41897  
mpineiro@mnrlawfirm.com  
One Biscayne Tower  
2 South Biscayne Boulevard, Suite 2530  
Miami, Florida 33131  
Telephone: (305) 400-4260

*Counsel for Defendant Huaqin Co. Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 21, 2022, a true and correct copy of the foregoing Notice of Appearance was served via CM/ECF on all counsel or parties of record on the Service List.

By: /s/ Michael A. Pineiro  
Michael A. Pineiro