

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

BELL NORTHERN RESEARCH, LLC,

Plaintiff,

v.

HMD AMERICA, INC., HMD GLOBAL OY,
SHENZHEN CHIINO-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.

Case No. 1:22-CV-22706-RNS

DECLARATION OF HUANG, CHIN-MIN IN SUPPORT OF
HON HAI PRECISION INDUSTRY CO., LTD'S MOTION TO DISMISS FOR
LACK OF PERSONAL JURISDICTION

I, HUANG, Chin-Min, submit the following declaration in support of Hon Hai Precision Industry Co., LTD's ("Hon Hai") Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned matter.

1. I am more than eighteen (18) years of age. I am fully competent to make this declaration.

2. I have personal knowledge of the facts below, and would testify to such facts under oath if asked to do so. The facts set forth in this declaration are true and correct to the best of my knowledge based on a diligent investigation.

3. I am currently employed by Hon Hai as Deputy Spokesperson. I have been employed with Hon Hai since 2014 and as Deputy Spokesperson since 2017.

4. I have been informed that the Plaintiff alleges in this matter that Hon Hai makes, uses, sells, imports and/or provides or causes to be used certain Nokia phones and tablets (“Accused Products”) that infringe its patents in the State of Florida.

5. Hon Hai does not have contacts with the State of Florida. Further, Hon Hai does not make, use, sell, offer to sell, or import any of the Accused Products to, or on behalf of, Nokia.

6. Hon Hai is incorporated under the laws of Taiwan, and its principal place of business is No. 66, Zhongshan Road, Tucheng Industrial Zone, Tucheng District, New Taipei City, Taiwan.

7. Hon Hai has no physical presence in the State of Florida. Hon Hai has no offices, facilities, warehouses, stores, agents, or employees in the state of Florida. Hon Hai does not own, lease, possess, maintain, or control any real property in the State of Florida. Hon Hai is not presently registered to do business in Florida, does not pay any taxes in Florida, and does not have accounts with any banks or financial institutions in the State of Florida.

8. Hon Hai does not provide any services in the State of Florida. Hon Hai does not send employees to perform work in the State of Florida. Hon Hai has does not hold meetings of the board of directors in the State of Florida.

9. Hon Hai does not specifically target the State of Florida with any marketing activity. For example, Hon Hai does not attend trade shows in the State of Florida, purchase advertising space in Florida newspapers, or distribute physical marketing materials in Florida, such as catalogs or brochures. Hon Hai does not provide any technical support or guidance targeting customers in the State of Florida.

10. Hon Hai does not currently make, use, sell, or offer to sell any products in the State of Florida. Hon Hai does not presently ship products to the State of Florida. Hon Hai does not currently conduct any business in the State of Florida.

11. Prior to 2018, Hon Hai rented a Florida warehouse from a third party to hold server and personal computing components unrelated to the Accused Products. Hon Hai paid for those Florida warehouse services until 2017.

12. I was informed of the record keeping systems and processes employed by Hon Hai to create and maintain information related to sales. Data entry personnel submit sales information into the system at or near the time of sale, and the records are maintained in the regular course of Hon Hai's business. Hon Hai has records of Florida sales that took place between 2011 and 2017, through the warehouse described above.

13. Hon Hai was registered to do business in Florida until 2018. Hon Hai is currently registered to do business in California and certain other states. Florida does not hold a special position among the states where Hon Hai has current or previous authorization to do business.

14. Hon Hai has been continuously registered to do business in California since 1999. Hon Hai has an office located in California.

15. Hon Hai has no involvement in the manufacture, use, sale, or offer for sale of any products in the State of Florida. Hon Hai has no involvement in the assembly, distribution, sale, or use of the Accused Products in the United States.

16. Hon Hai sells mobile device components and services to Foxconn International Holdings Mobile, Ltd. (“FIH Mobile”). To the extent that any Hon Hai components are used in the Accused Products, Hon Hai does not oversee or control which products incorporate the components, how the components are assembled, or where the products incorporating the components are sold. Hon Hai transfers possession of the mobile device components to FIH Mobile outside the United States. Hon Hai has no control of the mobile device components after they are transferred to FIH Mobile.

17. Hon Hai has no direct involvement in any activities of FIH Mobile related to the Accused Products, or the distribution of the Accused Products to the United States. Hon Hai does not have advance knowledge that any particular components will be included in Accused Products destined for the United States, or the State of Florida in particular.

18. Hon Hai is not the same company as FIH Mobile. Hon Hai owns approximately 63% of FIH Mobile’s stock, but it does not control the day-to-day operations of FIH Mobile. Hon Hai’s stock is publicly traded on the Taiwan stock exchange. FIH Mobile’s stock is also publicly traded, but on the Hong Kong stock exchange. The two companies could not be legally traded as separate companies on public stock exchanges if they were operated as a single business entity. No Hon Hai board member is also a FIH Mobile board member. The companies have separate CEOs, CFOs, COOs, Managers, and Vice Presidents. There is no overlap in the leadership, management, or employees of the two companies.

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