

**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 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.

No. 1:22-cv-22706-RNS

**JURY TRIAL DEMANDED**

**ANSWER AND DEFENSES OF DEFENDANTS TINNO MOBILE TECHNOLOGY  
CORP., SHENZHEN TINNO MOBILE CO., LTD., AND TINNO USA, INC., TO  
PLAINTIFF'S COMPLAINT FOR PATENT INFRINGEMENT**

Defendants Tinno Mobile Technology Corp., Shenzhen Tinno Mobile Co., Ltd., and Tinno USA, Inc. (collectively, "Tinno" or "Defendants") hereby answer the Complaint of Plaintiff Bell Northern Research, LLC ("BNR" or "Plaintiff"). To the extent not explicitly admitted, Defendants deny all allegations of the Complaint. Defendants deny that BNR is entitled to the relief requested or any other relief.

**NATURE OF THE ACTION**

1. This is an action for patent infringement arising under the Patent Laws of the United States, 35 U.S.C. § 1 *et seq.*

**ANSWER TO PARA. 1.** This paragraph states legal conclusions and allegations to which no answer is required. To the extent an answer is required, Defendants admit that Plaintiff purports to bring an action for patent infringement under the Patent Laws of the United States, but deny that they have committed any act that would give rise to any cause of action. Defendants deny any remaining allegations in this paragraph.

### **THE PARTIES**

2. Plaintiff BNR is a limited liability company organized under the laws of the State of Delaware with a place of business at 401 North Michigan Avenue, Chicago, Illinois 60611.

**ANSWER TO PARA. 2.** Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

3. Upon information and belief, Defendant HMD America, Inc. is a corporation organized and existing under the laws of the State of Florida, with its principal place of business at 1200 Brickell Ave., Suite. 510, Miami, Florida 33131. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services that into the stream of commerce and that incorporate infringing technology knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 3.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

4. Upon information and belief, Defendant HMD Global Oy is a corporation organized and existing under the laws of Finland, with its principal place of business at Bertel Jungin aukio 9, 02600 Espoo, Finland. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 4.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

5. Upon information and belief, Defendant Shenzhen Chino-E Communication Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at 139 Lixiang Road, Songmushan Dalang Town, Dongguan, 523770, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 5.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

6. Upon information and belief, Defendant Hon Hai Precision Industry Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at No.2, Ziyou St., Tucheng Dist., New Taipei City 236, Taiwan. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 6.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

7. Upon information and belief, Defendant Tinno Mobile Technology Corp. is a corporation organized and existing under the laws of China, with its principal place of business at 23/F, TINNO Building, No.33, Xiandong Rd, Xili, Nanshan District, Shenzhen, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 7.** Tinno denies that any entity with the name “Tinno Mobile Technology Corp.” exists, and therefore further denies the remaining allegations in this paragraph. To the extent that this paragraph may be read to apply to any existing Tinno entity, Tinno denies that it has engaged in allegedly infringing acts. Tinno denies the remaining allegations of this paragraph.

8. Upon information and belief, Defendant Shenzhen Tinno Mobile Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at 23/F, TINNO Building, No.33, Xiandong Rd, Xili, Nanshan District, Shenzhen, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 8.** Tinno denies that any entity with the name “Shenzhen Tinno Mobile Co., Ltd.” exists, and therefore further denies the remaining allegations in this paragraph. To the extent that this paragraph may be read to apply to any existing Tinno entity, Tinno denies that it has engaged in allegedly infringing acts. Tinno denies the remaining allegations of this paragraph.

9. Upon information and belief, Defendant Tinno USA, Inc. is a corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 2301 W. Plano Parkway, Suite 102, Plano, Texas, 75075. Upon information and belief, Tinno USA, Inc. is a wholly owned subsidiary of Tinno Mobile Technology Corp. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 9.** Tinno admits that Tinno USA, Inc. is organized and existing under the laws of the state of Delaware, and that it has a place of business at 2301 W. Plano Parkway, Suite 102, Plano, Texas, 75075. Tinno denies that it has engaged in allegedly infringing acts. Tinno denies the remaining allegations of this paragraph.

10. Upon information and belief, Defendant Unisoc Technologies Co., Ltd. is a corporation organized and existing under the laws of China with its principal place of business at Building 1, Zhanxun Center, Lane 2288, Zuchongzhi Road, Pudong New Area, Shanghai, 201203, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 10.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

11. Upon information and belief, Defendant Spreadtrum Communications USA Inc. is a corporation organized and existing under the laws of the State of Delaware with its principal place of business at 2674 N 1st St., San Jose, California, 95134. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 11.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

12. Upon information and belief, Defendant Wingtech Technology Co., Ltd. is a corporation organized and existing under the laws of China, with its principal place of business at No. 777, Subcentral Road, Nanhu District, Jiaxing, Zhejiang Province, China. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 12.** Defendants deny that Plaintiff has alleged infringement of any valid and asserted patent claim. Defendants lack sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

13. Upon information and belief, Defendant Wingtech International, Inc. is a corporation organized and existing under the laws of the State of California, with its principal place of business at 21900 Oakview Ln., Cupertino, California, 95014. Upon information and belief, Defendant sells and offers to sell products and services throughout the United States, including in this judicial district, and introduces products and services into the stream of commerce that incorporate infringing technology, knowing that they would be sold in this judicial district and elsewhere in the United States.

**ANSWER TO PARA. 13.** Tinno denies that Plaintiff has alleged infringement of any valid and asserted patent claim. Tinno lacks sufficient knowledge or information to either admit or deny the allegations in this paragraph of the Complaint, and therefore deny them.

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