

**IN 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
CORP., SHENZHEN TINNO MOBILE CO., LTD.,
UNISOC TECHNOLOGIES CO.
LTD., SPREADTRUM COMMUNICATIONS USA,
INC., WINGTECH TECHNOLOGY CO.,
LTD., WINTECH 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

**DEFENDANTS UNISOC TECHNOLOGIES CO. LTD.'S AND
SPREADTRUM COMMUNICATIONS USA, INC.'S MOTION TO DISMISS
AND INCORPORATED MEMORANDUM OF LAW**

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I. INTRODUCTION

Unisoc (Shanghai) Technologies Co., Ltd. (“Unisoc”) is a Chinese semiconductor company.¹ Spreadtrum Communications USA Inc. (“Spreadtrum”), a subsidiary of Unisoc, is incorporated in Delaware and has an office in California. Neither Unisoc nor Spreadtrum make, sell, or import any products in the United States. Plaintiff’s conclusory allegations, e.g., that Unisoc and Spreadtrum have “a regular and established place of business within this District” (ECF No. 1 at ¶¶ 26, 27), are both unfounded and contradicted by affidavit evidence submitted herewith. The Court lacks personal jurisdiction over Unisoc and Spreadtrum and should dismiss the Complaint against them. Further, because Spreadtrum does not reside or have a regular and established place of business in this District, the Court should dismiss the Complaint as to Spreadtrum for improper venue.

The Court should also dismiss the Complaint as to Unisoc and Spreadtrum for failure to state a claim. Plaintiff groups all defendants together and broadly alleges that mobile phones and tablets infringe thirteen patents but fails to identify any Unisoc or Spreadtrum product, service, or activity. Plaintiff fails to provide notice of its allegations of direct, indirect, and willful infringement against Unisoc and Spreadtrum. For this reason, such claims should be dismissed.

II. BACKGROUND

A. Unisoc lacks contacts with Florida and the United States

Unisoc is a Chinese semiconductor company organized under the laws of the People’s Republic of China and has its principal place of business in Shanghai, China. *See* Declaration of Zhen Zhang, attached hereto as **Exhibit 1** (Zhang Decl.), ¶¶ 3-4. Unisoc does not develop, design, manufacture, advertise, market, sell, import, or distribute products in the United States. Zhang

¹ The Complaint incorrectly identifies Unisoc as “Unisoc Technologies Co. Ltd.”

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