

**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

**DECLARATION OF ZHANG ZHEN**

I, ZHANG Zhen, declare as follow:

1. I serve as Vice President of Unisoc (Shanghai) Technologies Co., Ltd.  
("Unisoc").
2. I am knowledgeable about the facts within this declaration based on personal  
knowledge and investigation.
3. Unisoc is a corporation organized under the laws of the People's Republic of  
China.
4. Unisoc's principal place of business is Building 1, Zhanxun Center, Lane 2288,  
Zuchongzhi Road, Pudong New Area, Shanghai, China.
5. Unisoc does not develop, design, manufacture, advertise, market, sell, import, or  
distribute products in the United States.

6. Unisoc does not provide any post-sales service or support in the United States.

7. Unisoc has no distributor in the United States for its products and has established no distribution channel in the United States.

8. Unisoc is not registered to conduct business in Florida or any other state in the United States. Unisoc has no employees in the United States.

9. Unisoc does not own or lease any real or personal property in the United States.

10. Unisoc does not maintain a bank account in the United States and does not pay taxes in the United States.

11. Customers may incorporate Unisoc's chipsets in downstream products (e.g., mobile phones and tablets) and sell such downstream products in China or elsewhere in the world. Unisoc has no control over the incorporation of its chipsets into any downstream products and has no control over the distribution or sale of the downstream products. The manufacturers of downstream products have no obligations to inform Unisoc of the sales of downstream products.

12. Unisoc does not specifically design its chipsets to meet the requirements of the market of United States.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 15, 2022

\_\_\_\_\_[Signature: ZHANG Zhen]\_\_\_\_\_  
ZHANG Zhen



**Acta Chinese Language Services, LLC**  
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### CERTIFICATE OF ACCURACY

I, Evelyn Garland, am competent to translate from English into Chinese and Chinese into English, and certify that the English language document, *Declaration of ZHANG Zhen*, is a true and accurate translation of the Chinese language document, and vice versa, to the best of my abilities.

A handwritten signature in black ink that reads "Evelyn Garland".

Date: December 15, 2022

Evelyn Yang Garland

*ATA Certified Translator, English<->Chinese*  
*Maryland Court Certified Interpreter, English<->Mandarin*  
*Chinese*

President  
**Acta Chinese Language Services, LLC**

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美国佛罗里达南区  
联邦地区法院

BELL NORTHERN RESEARCH, LLC,

原告，

诉

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.,

被告。

案件编号: 1:22-cv-22706-RNS

章桢的声明

我，章桢，声明如下：

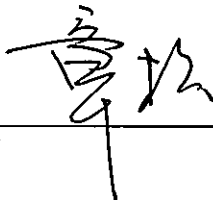
1. 我担任紫光展锐（上海）科技有限公司（“Unisoc”）的副总裁。
2. 据个人知识和调查，我知晓本声明中的事实。
3. Unisoc 是一家根据中华人民共和国法律组建的公司。
4. Unisoc 的主要营业地点是中国上海市浦东新区祖冲之路 2288 弄展讯中心 1

号楼。

5. Unisoc 不在美国开发、设计、制造、广告、营销、销售、进口或分销产品。
6. Unisoc 不在美国提供任何售后服务或支持。
7. Unisoc 在美国没有产品分销商，也没有在美国建立分销渠道。
8. Unisoc 没有在佛罗里达州或美国任何其他州注册开展业务。Unisoc 在美国没有雇员。
9. Unisoc 在美国不拥有或租赁任何不动产或动产。
10. Unisoc 在美国不维持银行账户，也不在美国交税。
11. 客户可能在下游产品（如手机和平板电脑）中加入 Unisoc 的芯片组，并在中国或世界其他地方销售该等下游产品。Unisoc 无法控制将其芯片组加入任何下游产品的行为，也无法控制该等下游产品的分销或销售。下游产品的制造商没有义务向 Unisoc 告知下游产品的销售情况。
12. Unisoc 并不专门为满足美国市场的要求而设计芯片组。

在作伪证将受到美利坚合众国法律伪证罪惩罚的前提下，我声明上述内容真实且正确。

签署日期：2022 年 12 月 15 日

  
章桢