

Exhibit A



1526 Gilpin Avenue
Wilmington, Delaware 19806
United States of America
Tel: 302-449-9010
Fax: 302-353-4251
www.devlinlawfirm.com

ANDREW F. PRATT
DIRECT DIAL: (206) 779-4023

June 21, 2023

VIA EDIS

The Honorable Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street SW
Washington, D.C. 20436

Re: ***Certain Electronic Devices and Semiconductor Devices Having Wireless Communication Capabilities and Components Thereof***

Dear Secretary Barton:

On behalf of our client, Bell Northern Research, LLC (“BNR” or “Complainant”), we are filing a complaint, including certain ancillary documents, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. §1337, against NXP Semiconductors, N.V. and NXP USA, Inc.; Laird Connectivity, LLC; Qualcomm Technologies, Inc.; MediaTek Inc. and MediaTek USA Inc.; and ASUSTek Computer Inc. and ASUS Computer International (collectively, the “Respondents”).

BNR makes this filing under the U.S. International Trade Commission’s Temporary Change to Filing Procedures dated March 16, 2020, and includes the following:

1. One (1) electronic copy of Complainant’s Verified Complaint and the Public Interest Statement (Commission Rules 210.8 (a)(1)(i) and 210.8(b));
2. One (1) electronic copy of the non-confidential exhibits and public versions of the confidential exhibit (Commission Rule 210.8(a)(1)(i));
3. One (1) electronic copy of the confidential exhibit (Commission Rules 210.8(a)(1)(ii) and 201.6(c));
4. One (1) electronic copy of the certified versions of the asserted United States Patents, U.S. Patent Nos. 7,564,914, RE 48,629; and 8,416,862 (collectively “the Asserted Patents”), cited in the Complaint as Exhibits 1-3 (Commission Rule 210.12(a)(9)(i));

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5. One (1) electronic copy of the certified versions of the prosecution histories for each of the Asserted Patents included as Appendices A, B, and C to the Complaint (Commission Rule 210.12(c)(1));
6. One (1) electronic copy of the assignment records for the Asserted Patents cited in the Complaint as Exhibits 4-6 (Commission Rule 210.12(a)(9)(ii));
7. One (1) electronic copy of the patent and technical reference documents identified in the prosecution histories of the Asserted Patents, included in the Complaint as Appendices D, E, and F (Commission Rule 210.12(c)(2)); and
8. One (1) electronic copy of BNR's letter and certification requesting confidential treatment of information appearing in Confidential Exhibit 58C to the Complaint (Commission Rules 210.5(d) and 201.6(b)).

Respectfully submitted,

Dated: June 21, 2023

DEVLIN LAW FIRM LLC



Timothy Devlin
Andrew Pratt
Lowell D. Jacobson
Srikant Cheruvu
1526 Gilpin Avenue
Wilmington, DE 19806
Tel: (302) 449-9010
tdevlin@devlinlawfirm.com
apratt@devlinlawfirm.com
ljacobson@devlinlawfirm.com
scheruvu@devlinlawfirm.com

*Attorneys for Complainant
Bell Northern Research, LLC*

Enclosures



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Re: ***Certain Electronic Devices and Semiconductor Devices Having Wireless Communication Capabilities and Components Thereof***

Dear Secretary Barton:

On behalf of our client, Bell Northern Research, LLC (“BNR”), attached is a complaint, including certain ancillary documents, pursuant to Section 337 of the Tariff Act of 1930, as amended, 19 U. S. C. § 1337 against NXP Semiconductors, N.V. and NXP USA, Inc.; Laird Connectivity, LLC; Qualcomm Technologies, Inc.; MediaTek Inc. and MediaTek USA Inc.; and ASUSTek Computer Inc. and ASUS Computer International (collectively, the “Respondents”).

Pursuant to Commission Rules 201.6(b) and 210.5(d), BNR respectfully requests confidential treatment of the information contained in Confidential Exhibits 47C and 58C to the Complaint.

The information contained Confidential Exhibits 47C and 58C to the Complaint qualify as confidential information pursuant to 19 C.F.R. § 201.6(a) in that they contain proprietary commercial information, proprietary commercial relationships, and/or proprietary business information that is not otherwise publicly available, and because the disclosure of such information would cause substantial harm to BNR and the suppliers of the information, and would also impair the Commission’s ability in the future to obtain such types of information in performance of its statutory function.

If the Commission decides not to grant such confidential treatment to these Confidential Exhibits, we respectfully ask the Commission to contact us promptly so that we may have an opportunity to explain our request for confidential treatment.

BNR’s filing of the confidential information should not be construed as any waiver of any right to confidentiality that may otherwise be available. BNR reserves the right to request the return of any confidential information wo which the Commission decides not to afford confidential treatment.

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June 21, 2023

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I certify that the proprietary confidential commercial information, proprietary commercial relationships, and/or proprietary business information present in these exhibits is not reasonably available to the public, and thus warrants confidential treatment.

Respectfully submitted,

Dated: June 21, 2023

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Wilmington, DE 19806
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tdevlin@devlinlawfirm.com
apratt@devlinlawfirm.com
cclayton@devlinlawfirm.com
scheruvu@devlinlawfirm.com

*Attorneys for Complainant
Bell Northern Research, LLC*

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