Filed on behalf of: Enfora, Inc., Novatel Wireless Solutions, Inc., and Novatel Wireless, Inc.

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ENFORA, INC., NOVATEL WIRELESS SOLUTIONS, INC., and NOVATEL WIRELESS, INC. Petitioners

v.

M2M SOLUTIONS LLC Patent Owner

U.S. Patent No. 8,648,717

## **DECLARATION OF RANDALL A. SNYDER**

DOCKET

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I, Randall A. Snyder, declare as follows:

#### I. <u>INTRODUCTION</u>

1. I have been retained by Enfora, Inc., Novatel Wireless Solutions, Inc., and Novatel Wireless, Inc. as an independent expert consultant to provide expert testimony in support of Petitioner's Petition for *Inter Partes* Review (the "Petition") of Claims 1-7, 10-14, 18, and 21-30 ("Challenged Claims") of U.S. Patent No. 8,648,717 ("the '717 Patent").

2. I have reviewed and am familiar with the '717 Patent and its file history, which have been provided to me as Exhibits 1001 and 1003. I understand these to be exhibits to the Petition.

3. I have also been provided, reviewed, and am familiar with Exhibits 1002 and 1004-1033, which I understand to be the remaining Exhibits to the Petition.

4. I have been asked to consider, among other things, whether certain references make obvious Claims 1-7, 10-14, 18, and 21-30 of the '717 Patent. My opinions as to these issues are set forth below.

5. I am being compensated at my normal consulting rate for the time I spend on this matter. No part of my compensation is dependent on the outcome of this proceeding or any other proceeding involving the '717 Patent. I have no other interest in this proceeding.

#### II. QUALIFICATIONS

6. I have over 30 years of experience in mobile telecommunications network and system architecture, engineering, design and technology.

7. I have a Bachelor's Degree in Mathematics from Franklin and Marshall College.

8. I have taught many classes and seminars on telecommunication network technologies and have been a panelist and speaker at numerous conferences at the Institute of Electrical and Electronics Engineers (IEEE), the Personal Communication Society (PCS), and the Cellular Telecommunications and Internet Association (CTIA) as an expert in telecommunication networks.

9. I spent seven years developing standards within the American National Standards Institute's subsidiary organization, the Telecommunications Industry Association (TIA), providing technical contributions and authoring and editing telecommunications proposed standards documents.

I am the co-author of the McGraw-Hill books "Mobile
Telecommunications Networking with IS-41," and "Wireless Telecommunications
Networking with ANSI-41, 2nd edition" published in 1997 and 2001, respectively.
These books have sold several thousand copies and were required reading for
mobile engineers at AT&T Wireless and Motorola for several years.

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