IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

M2M SOLUTIONS LLC,

        Plaintiff,

    v.

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

        Defendants.

C.A. No. 14-1101-RGA

PLAINTIFF M2M SOLUTIONS LLC'S
PRELIMINARY INFRINGMENT CONTENTIONS

What follow are plaintiff M2M Solutions LLC's Preliminary Infringement Contentions.

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ENFORA/NOVATEL's Enabler HS 3001 Family of Embedded Wireless Modules

(Model: CNN0301-10)
U.S. Patent No. 8,648,717 B2

Claim Element		Infringement Support
1.	A programmable communicator device comprising:	Enfora describes the Enabler HS 3001 modules as being designed to communicate over GSM cellular telephone networks as part of m2m applications used by Enfora's customers or end-users. For example, Enfora indicates that the Enabler HS 3001 modules are "a Qualcomm® chipset-based 1xRTT (CDMA2000) cellular module . . . [w]ith a dual-band 1xRTT radio and Sprint and Verizon certifications." (M2M_ENFONOV_0000500-01) Enfora further describes the Enabler HS 3001 modules as including product features of GPS, Voice, and SMS. (M2M_ENFONOV_0000501) Enfora documents describe the Enabler HS 3001 modules as being programmable via AT commands. (ENFA_M2M_0010800)
1.a	a programmable interface for establishing a communication link with at least one monitored technical device, wherein the programmable interface is programmable by wireless packet switched data messages; and	The Enabler HS 3001 modules have several different interfaces identified below through which they can be linked to monitored technical devices, each of which is able to be directly programmed by the module's firmware in response to certain supported AT commands. Each of the accused interfaces is able to be directly programmed, including by or in response to certain supported AT commands that constitute or result in programming instructions that serve to cause the configuration of control registers and/or data registers residing within the interface circuitry of the interfaces, or that serve to cause the interfaces to responsively return data values. The Enabler HS 3001 modules include programmable interfaces that are able to be directly programmed by the modules' firmware and are capable of forming a communication link with any number of different types of monitored technical devices including, for example,

Claim Element	Infringement Support
	utility meters, security alarm systems, and telemedicine devices. (ENFA_M2M_0011070-71)
	The Enabler HS 3001 modules have a serial interface. ((M2M_ENFONOV_0000501). This interface is programmable via AT commands that include the **ATE**, **AT&C**, **AT&D**, and **AT**+**IPR** commands. (ENFA_M2M_0010849-50; ENFA_M2M_0010856-57)
	The Enabler HS 3001 modules have multiple General Purpose I/O ("GPIO") pin interfaces. (M2M_ENFONOV_0000501). These interfaces are programmable via AT commands that include the **AT$IOCFG**, **AT$IOGP(x)**, and **AT$IOGPA** commands. (ENFA_M2M_0010918-19; ENFA_M2M_0010921-23)
	The Enabler HS 3001 modules have an Analog to Digital Converter ("ADC") interface. (M2M_ENFONOV_0000501). This interface is programmable via AT commands that include the **AT$IOADC** command. (ENFA_M2M_0010917-18)
	An Enabler HS 3001 module supports the capability for running AT commands remotely on the module. As such, the module contains firmware that is able to directly process and execute supported AT commands received in incoming wireless packet switched data messages sent to the module over-the-air by remote devices. Said wireless packet switched data messages can comprise UDP/IP data messages sent over a CDMA network connection. (M2M_ENFONOV_0000501) (Cone Dep., pp. 83-87)
	In addition, each of the accused interfaces is able to be directly programmed by having their control registers configured by microprocessors and/or reset controllers as part of various hardware reset processes, and/or by having their control registers configured or their data values queried by microprocessors.

Claim Element		Infringement Support
1.b	a processing module for authenticating one or more wireless transmissions sent from a programming transmitter and received by the programmable communicator device by determining if at least one transmissions contains a coded number;	The Enabler HS 3001 modules include a software component of the programmable communicator (*i.e.*, a "processing module") that is capable of authenticating one or more incoming wireless transmissions containing a programming instruction. The processing module authenticates the one or more incoming wireless transmissions by determining whether the at least one of the transmissions contains a required coded number. If the processing module is able to successfully authenticate the one or more incoming wireless transmission in this manner, then the programmable communicator will process and execute the programming instruction.

API Password

An Enabler HS 3001 module supports the **AT$APIPWD** command which enables setting an API Password for restricting remote API access by IP addresses. When the API Password functionality has been enabled and the module receives one or more incoming UDP/IP wireless transmissions, the module requires at least one of the transmissions to include an API Password coded number. (ENFA_M2M_0010943; ENFA_M2M_0007154) (Cone Dep., pp. 101, 105-11)

In sum, when an Enabler HS 3001 module receives one or more incoming wireless transmission from a programming transmitter containing AT commands when the API Password functionality is enabled, the module's firmware will act as a processing module to authenticate the at least one of the transmissions by determining if the at least one of the transmissions contains the required API Password coded number. |
| 1.c | wherein the programmable communicator device is configured to use a memory to store at least one telephone number or IP address included within at least one of the transmissions as one or more stored telephone numbers or IP addresses if the processing | Only if an Enabler HS 3001 module has authenticated the at least one of the transmissions as including the API Password as described above, will its firmware then execute the relevant AT command.

SMSDA White List

An Enabler HS 3001 module has an SMSDA white list in its non-volatile memory which is a memory module |

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