IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

M2M SOLUTIONS LLC,   C.A. No. 12-030-RGA
a Delaware limited liability company,

SIERRA WIRELESS AMERICA, INC., a
Delaware corporation, and SIERRA
WIRELESS, INC., a Canadian corporation,

M2M SOLUTIONS LLC,   C.A. No. 12-031-RGA
a Delaware limited liability company,

CINTERION WIRELESS MODULES GMBH,
a German limited liability company,
CINTERION WIRELESS MODULES NAFTA
LLC, a Delaware limited liability company,

M2M SOLUTIONS LLC,   C.A. No. 12-032-RGA
a Delaware limited liability company,

ENFORA, INC., a Delaware corporation,
NOVATEL WIRELESS SOLUTIONS,
INC., a Delaware corporation, and
NOVATEL WIRELESS, INC, a
Delaware corporation,

M2M SOLUTIONS LLC,   C.A. No. 12-033-RGA
a Delaware limited liability company,

MOTOROLA SOLUTIONS, INC., a Delaware
corporation, TELIT COMMUNICATIONS PLC,
a United Kingdom public limited company, and
TELIT WIRELESS SOLUTIONS INC., a
Delaware corporation,

DEFENDANTS' INITIAL INVALIDITY CONTENTIONS

Pursuant to Paragraph 3(a)(iv) of the Coordinated Rule 16 Scheduling Order

(Doc. No. 32), Defendants Motorola Solutions, Inc., Telit Communications PLC, Telit Wireless

Solutions Inc., Sierra Wireless America, Inc., Sierra Wireless, Inc., Cinterion Wireless Modules

GMBH, Cinterion Wireless Modules NAFTA LLC, Enfora, Inc. Novatel Wireless Solutions,

Inc., and Novatel Wireless, Inc. (collectively, "Defendants"), hereby serve their Initial Invalidity

Contentions for the asserted claims of U.S. Patent Nos. 7,583,197 ("the '197 patent") and

8,094,010 ("the '010 patent") (collectively, the "Asserted Patents") identified by Plaintiff M2M

Solutions LLC ("M2M" or "Plaintiff"), as well as the related invalidating references (e.g.,

publications, manuals and patents).

These Initial Contentions are necessarily preliminary and are provided without

prejudice to Defendants' rights. Defendants' initial invalidity contentions are based on

information reasonably available to Defendants, and Defendants expressly reserve the right to

amend, or supplement these Initial Contentions based on further investigation, discovery,

CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of:

1. **DEFENDANTS' INITIAL INVALIDITY CONTENTIONS,** including Appendices A-Z and AA-CC; and

2. **DEFPRIORART000001–DEFPRIORART003830**

were caused to be served on March 8, 2013 upon the following, via electronic mail containing a

hyperlink, username and password to a file transfer protocol ("FTP") window containing

downloadable PDF files of all said documents:

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Appendix X - US Patent No. 6,900,737 ("Ardalan")

The following charts and references disclose how US Patent No. 6,900,737 ("Ardalan"), incorporating GSM 03.02 version 5.5.0 (published March 1996), disclosed the subject matter of the asserted claims. Ardalan has a priority date of February 12, 1997 and is prior art to the asserted patents under 35 U.S.C. §102(a).

U.S. Patent No. 7,583,197

No.	Claim limitation	US Patent No. 6,900,737
07	A programmable communicator device comprising:	"The present invention provides an automatic meter reading (AMR) system that collects readings from multiple or individual meters or sets parameters in individual or multiple meters using the Short Message Service (SMS) in digital cellular networks" (col. 1 ll. 33-37). "Meters can also be programmed by SMS packets from the AMR server" (col. 7 lines 54-55).
	a wireless communications circuit having an antenna and configured to communicate over a communications network;	"A single meter 21 … with its own wireless access module to the SMS of the DCN [Digital Cellular Network] 10 can receive SMS packets and return the results to the originator of the SMS packet via the DCN" (col. 7 lines 1-4); "providing each meter with a direct interface to the DCN 10 so that every meter can send and receive SMS packets" (col. 3 ll. 55-58). DCN is a "digital cellular network" (col. 1 ll. 46-47). A direct interface to a Digital Cellular Network (DCN) inherently includes an antenna.
	a programmable identity module having a unique identifier that is unique to the programmable communicator device;	"The meters 21 … may send may send the following types of messages … Reading of the unique 32-bit meter ID" (col. 4 ll. 14-15 and 24).
	a programmable interface connected to at least one wired or	"the meters … send the following types of messages to the AMR server: (1) notification of meter tampering; (2) notification of power outages; (3)

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