Patent Owner's Preliminary Response Inter Partes Review of U.S. Patent No. 8,648,717

Paper No.

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

Case IPR2015-01672 Patent No. 8,648,717 B2

PATENT OWNER'S PRELIMINARY RESPONSE PURSUANT TO 35 U.S.C. § 313 AND 37 C.F.R. § 42.107

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1.	"a <i>programmable interface</i> for establishing a communication link with at least one monitored technical device" (element (b))			
2.	"and a processing module for <i>authenticating</i> one or more wireless transmissions sent from a programming transmitter and received by the programmable communicator device <i>by determining if at least one</i> <i>transmission contains a coded number</i> " (element (d))19			
3.	"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 module authenticates the at least one of the transmissions including the at least one telephone number or IP address and the coded number by determining that the at least one of the transmissions includes the coded number" (element (e))			
4.	"the one or more stored telephone numbers or IP addresses being numbers to which the programmable communicator device is configured to and permitted to send outgoing wireless transmissions;"(element (f))28			
5.	"wherein the programmable communicator device is configured to process data received through the programmable interface from the at least one monitored technical device in response to programming instructions received in an incoming wireless packet switched data message." (element (i))			
6.	Whitley and Ardalan do not disclose all of the elements of claim 24			
7.	Whitley and Ardalan not disclose all of the elements of claim 29			
Whitley and Ardalan Fail to Disclose Material Elements Present in Dependent Claims 4 and 540				

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Patent Owner's Preliminary Response Inter Partes Review of U.S. Patent No. 8,648,717

VII.

1	1.	A programmable communicator device according to claim 1 wherein the programmable communicator device is configured to process wireless transmissions compliant with Bluetooth wireless air interface standards. (Claim 4)40
2	2.	A programmable communicator device according to claim 1 further configured to request that an at least one monitored technical device send data through the programmable interface for processing by the programmable communicator device in response to programming instructions received in an incoming wireless packet switched data message. (Claim 5)41
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