IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

M2M SOLUTIONS LLC,

       Plaintiff,

v.

TELIT COMMUNICATIONS PLC, and
TELIT WIRELESS SOLUTIONS INC.,
       Defendants.

C.A. No. 14-1103-RGA

PLAINTIFF M2M SOLUTIONS LLC'S
<u>PRELIMINARY INFRINGMENT CONTENTIONS</u>

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

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Claim Element		Infringement Support
1.	A programmable communicator device comprising:	Telit describes the GM863 modules as being designed to communicate over GSM cellular telephone networks as part of m2m applications used by Telit's customers.

Telit indicates that the GE863 modules are "now boasting quad-band functionality . . . for global GSM networks. . . . the Telit GE863-QUAD is the perfect platform for compact medium to high volume m2m applications" and "[t]he new GE863-GPS is the smallest GSM/GPRS module . . . [that] combines the high performance from Telit's proven GSM/GPRS technology." (TELIT 01230; TELIT 01025)

Telit further describes the GE863 modules as including product features of "[q]uad-band EGSM 850/900/1800/1900MHz," and also "features like GPRS Class 10, Voice Communication, Circuit Switched Data Transfer, Fax, Phonebook, SMS support and 'Easy GPRS' embedded TCP/IP stack . . . designed and developed by Telit for OEM usage and dedicated to portable data, voice and telematics applications." (TELIT 01025; TELIT 01111; TELIT 01230)

Telit documents describe the GE863 modules as being programmable via standard and proprietary AT commands, including being subject to "[c]ontrol via AT commands according to GSM 07.05, 07.07 and Telit enhancements." (TELIT 01025; TELIT 01230; TELIT 01120; TELIT 01144) |
| **1.a** | a programmable interface for establishing a communication link with at least one monitored technical device, wherein the programmable interface is programmable by | The GE863 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 |

Claim Element	Infringement Support
wireless packet switched data messages; and	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. These interfaces are capable of forming a communication link with any number of different types of monitored technical devices including, for example, utility meters, telemedicine devices, and vending machines. (General Information: Machine to machine communication (m2m), TELIT WIRELESS SOLUTIONS, http:// http://www.telit.com/experience-telit/what-is-m2m/general-information/) The GE863 modules have one or more serial interfaces. These interfaces are programmable via AT commands that include the **ATE**, **AT&C**, **AT&D**, and **AT+IPR** commands. (TELIT 01026; TELIT 01052-1059; TELIT 01112; TELIT 01134; TELIT 08928; TELIT 08931-8932; TELIT 08934-8935) The GE863 modules have multiple General Purpose I/O ("GPIO") pin interfaces. These interfaces are programmable via AT commands that include the **AT#GPIO** command. (TELIT 01026; TELIT 01080-1081; TELIT 01112; TELIT 01121; TELIT 01123; TELIT 09155-9157) The GE863 modules have an Analog to Digital Converter ("ADC") interface. This interface is programmable via AT commands that include the **AT#ADC** command. (TELIT 01026; TELIT 01112; TELIT 01125; TELIT 09159-9160).

Claim Element		Infringement Support
		The GE863 modules support the capability for running AT commands remotely through use of the TCPATRUN service. As such, these modules contain firmware that is able to directly process and execute supported AT commands received in incoming wireless transmissions sent to the modules by a programming transmitter. Said wireless transmissions can comprise TCP/IP data messages, including GPRS data messages. (TELIT 13212-29; TELIT 14027-30) 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 in response to receiving certain API function calls from embedded customer applications.
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 GE863 modules include a software component of the programmable communicator (*i.e.*, a "processing module") that is capable of authenticating an incoming wireless transmission containing a programming instruction. The processing module authenticates the incoming wireless transmission by determining whether it contains a required coded number. If the processing module is able to successfully authenticate the incoming wireless transmission in this manner, then the programmable communicator will process and execute the programming instruction. PIN2 Password A GE863 module has a SIM interface for connecting to and controlling a Subscriber Identity Module ("SIM card"). (TELIT 01025; TELIT 01230; TELIT 01112; TELIT 01120-22)

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