

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

M2M SOLUTIONS LLC,
Patent Owner.

Case IPR2016-00055
Patent 8,648,717

M2M SOLUTIONS LLC'S OBJECTIONS TO EVIDENCE

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Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

Pursuant to 37 C.F.R. § 42.64 (b) Patent Owner, M2M Solutions LLC (“M2M”) objects under the Federal Rules of Evidence (“FRE”) to Exhibits 1105, 1114, 1115, 1116, and 1122 cited in Telit Wireless Solutions Inc. and Telit Communications PLC.’s (collectively, “Telit”) Petition for *Inter Partes* Review (“Petition”).¹ The Patent Trial and Appeal Board instituted trial on April 22, 2016²; therefore, M2M’s Objections to Evidence are timely under 37 C.F.R. § 42.64(b)(1).

I. OBJECTIONS TO EXHIBITS 1114, 1115, 1116, AND 1122

Exhibit 1114: M2M objects to Exhibit 1114, Bettstetter C., “GSM Phase 2+ General Packet Radio Service GPRS: Architecture, Protocols, and Air Interface”, IEEE Communications Survey, 1999, because it is inadmissible hearsay under FRE 802; it has not been properly authenticated, as required by FRE 901; and this exhibit is not self-authenticating under FRE 902.

Exhibit 1115: M2M objects to Exhibit 1115, Ames et al., “The Evolution of Third-Generation Cellular Standards”, Intel Technology Journal, Q2, 2000, because it is inadmissible hearsay under FRE 802; it has not been properly authenticated, as required by FRE 901; and this exhibit is not self-authenticating

¹ Paper 1, filed October 21, 2015.

² See Paper 9, entered April 22, 2016.

under FRE 902

Exhibit 1116: M2M objects to Exhibit 1116, 1G, 2G, 3G, 4G - The Evolution of Wireless Generations,” 2008, because it is inadmissible hearsay under FRE 802; it has not been properly authenticated, as required by FRE 901; and this exhibit is not self-authenticating under FRE 902.

Exhibit 1122: M2M objects to Exhibit 1122, Redl et al. “GSM and Personal Communications Handbook,” 1998, because it is inadmissible hearsay under FRE 802; it has not been properly authenticated, as required by FRE 901; and this exhibit is not self-authenticating under FRE 902.

II. OBJECTIONS TO EXHIBIT 1105

M2M objects to paragraphs 35, 88, 97, 98, 104, and 105, in Exhibit 1105, under FRE 703, to the extent those paragraphs rely on Exhibit 1114, which M2M has objected to as inadmissible evidence.

M2M objects to paragraphs 35, 47, 48, 83, and 104 in Exhibit 1105, under FRE 703, to the extent those paragraphs rely on Exhibit 1115, which M2M has objected to as inadmissible evidence.

M2M objects to paragraph 47 in Exhibit 1105, under FRE 703, to the extent that paragraph relies on Exhibit 1116, which M2M has objected to as inadmissible evidence.

M2M objects to paragraphs 47, 48, 83, 104, 118, and 202 in Exhibit 1105,

M2M Solutions LLC's Objections to Evidence
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under FRE 703, to the extent those paragraphs rely on Exhibit 1122, which M2M
has objected to as inadmissible evidence.

Dated: May 6, 2016

Respectfully Submitted,

/s/ Jeffrey N. Costakos
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CERTIFICATION OF SERVICE

The undersigned hereby certifies that the above-captioned **M2M SOLUTIONS LLC'S OBJECTIONS TO EVIDENCE** was served in its entirety on May 6, 2016, upon the following parties via e-mail:

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FOLEY & LARDNER LLP

Date: May 6, 2016

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