

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

M2M SOLUTIONS LLC,  
a Delaware limited liability company,

Plaintiff,

v.

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

Defendants.

**C.A. No. 12-033-RGA**

**EXPERT REPORT OF KIMMO SAVOLAINEN  
IN REBUTTAL TO DR. NETTLETON AND MR. BLUESTEIN**

I have been retained by Telit Communications PLC (“Telit PLC”) and Telit Wireless Solutions Inc. (“Telit Wireless”) (collectively with Telit PLC, “Telit”) to serve as an expert in this lawsuit. I expect to testify at trial regarding the matters discussed in this report if asked about them by the Court or the parties’ attorneys.

**C. Digest SMS AT RUN Service**

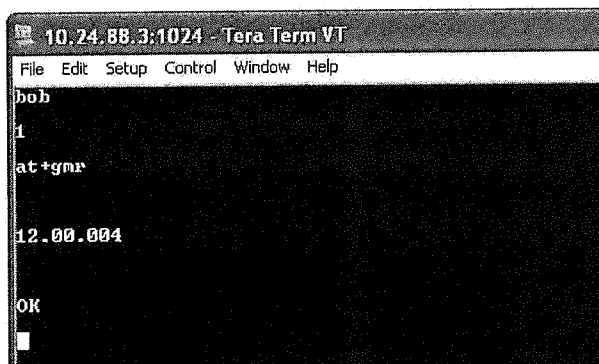
82. “By default the SMS ATRUN service is disabled” (Ex. 1, 13211, para. 11; see also Ex. 8, 09227). A user can, but is not required to, send SMS messages including AT commands to program the module using the SMS AT RUN service.

83. If used, the SMS ATRUN service must be programmed locally over a wired connection: “First of all, the SMSATRUN service provided by the remote module is locally configured and enabled” (Ex. 1, 13204). Dr. Nettleton states that the SMS AT RUN service could be initiated remotely by “a special SMS data message sent from the Telit server” (Nettleton Report para. 56, referring to Ex. 1, 13211 para. 11). However, this functionality was never available in the U.S. (Ex. 29, Contento Tr. at 132, 135).

84. There are two types of SMS AT RUN services: Simple AT RUN SMS and Digest AT RUN SMS (Ex. 1, 13201-2).

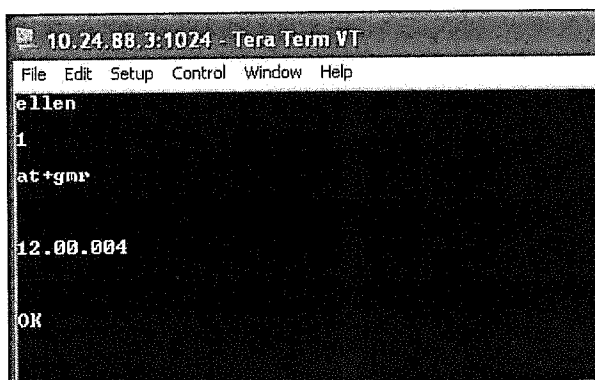
85. Simple mode allows whitelist callers to use the AT RUN service without requiring a password (Ex. 1, 13201). The message is only checked for the caller’s telephone number (Ex. 1, 13201). I do not see that M2M has accused Simple AT RUN SMS mode of infringing the ‘010 Patent (Nettleton Report, para. 54).

86. Digest mode (not Simple mode) is alleged to infringe the ‘010 Patent (see modes 1 and 3, Nettleton Report, para. 54). Digest mode allows messages from callers that are not on the whitelist to be treated as AT RUN messages if an MD5 digest in the message matches one that is locally calculated (Ex. 1, 13202). A permitted caller list must block non-permitted callers (see e.g. ‘010 Patent, Fig. 2, step 4). Because callers not on the whitelist can program the module using Digest AT RUN SMS service, the whitelist does not block non-whitelist callers from programming using the SMS AT RUN service, and is therefore not a permitted caller list.



```
10.24.88.3:1024 - Tera Term VT
File Edit Setup Control Window Help
bob
1
at+gmr
12.00.004
OK
```

or “Ellen<CR>1<CR>”:



```
10.24.88.3:1024 - Tera Term VT
File Edit Setup Control Window Help
ellen
1
at+gmr
12.00.004
OK
```

Since two users can have the same password, e.g., 1, there is nothing in the firmware that requires the password to be unique.

98. In the examples above, a password of zero characters and one character were accepted. The firmware only provides an upper limit of 50 characters (Ex. 8, 09234), but does not provide a lower limit. A password “1” having one character can certainly not be considered unique.

99. The claims require “authenticating at least one transmission ... the *at least one* transmission including a coded number *and* at least one telephone number or Internet Protocol (IP) address” (claims 1 and 52, emphasis added). That is, both the coded number *and* the telephone number or IP address must be included in *one* transmission.

Dated: July 7, 2014



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Kimmo Savolainen