

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

TELIT WIRELESS SOLUTIONS INC., TELIT COMMUNICATIONS
PLC, SIERRA WIRELESS AMERICA, INC., SIERRA WIRELESS, INC.,
and RPX CORP.,
Petitioners,

v.

M2M SOLUTIONS LLC,
Patent Owner.

Case IPR2016-00055¹

Patent 8,648,717 B2

**PETITIONER'S REPLY IN SUPPORT OF
PETITION FOR *INTER PARTES* REVIEW**

¹ Case IPR2016-01073 has been joined with this proceeding.

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LIST OF EXHIBITS

Ex. No.	Description
1101	U.S. Patent 8,648,717 (“the ‘717 Patent”) issued Feb. 11, 2014, from U.S. App. 13/934,763 filed Jul. 3, 2013
1102	Patent Owner’s Preliminary Infringement Contention Claim Chart against Petitioners in the ‘717 Patent litigation (excerpts). (Exhibit improperly marked confidential, <i>see</i> appended Discovery Dispute Hearing transcript at 72:9-73:9, designating infringement contentions as non-confidential information.)
1103	File History for U.S. App. 13/328,095 issued as U.S. Patent No. 8,633,802 (“the ‘802 Patent”) (excerpt)
1104	File History for U.S. App. 13/934,763 issued as the ‘717 Patent (excerpt)
1105	Expert Declaration of Kimmo Savolainen in support of Petition for IPR of the ‘717 Patent based on Van Bergen (Curriculum Vitae attached)
1106	U.S. Patent 8,094,010 (“the ‘010 Patent”) issued Jan. 10, 2012, from U.S. App. 12/538,603 filed Aug. 10, 2009
1107	Microsoft Computer Dictionary Fourth Edition, 1999 (excerpt)
1108	Joint Claim Construction Statement in ‘717 Patent Litigation

Ex. No.	Description
1109	District Court Memorandum Opinion on Claim Construction in the litigation of U.S. Patent 7,583,197 (“the ‘197 Patent”) and the ‘010 Patent, Nov. 12, 2013
1110	Transcript of the Deposition of Dr. Ray Nettleton, “Nettleton Tr.” May 6, 2015
1111	District Court Claim Construction Order in the litigation of the ‘197 and ‘010 Patents, Nov. 19, 2013, and Clarification, Jan. 24, 2014
1112	<i>Ex parte Takahashi</i> , No. 2004-2192, 2004 WL 2733658 (BPAI 2004)
1113	International Publication No. WO 00/17021 to Van Bergen published Mar. 30, 2000 (“Van Bergen”)
1114	Bettstetter C., “GSM Phase 2+ General Packet Radio Service GPRS: Architecture, Protocols, and Air Interface”, IEEE Communications Survey, 1999
1115	Ames et al., “The Evolution of Third-Generation Cellular Standards”, Intel Technology Journal, Q2, 2000
1116	1G, 2G, 3G, 4G - The Evolution of Wireless Generations,” 2008 (Referenced in Expert Declaration of Kimmo Savolainen, Ex. 1105)
1117	Bhalla, “Generations of Mobile Wireless Technology: A Survey” International Journal of Computer, August 2010

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