IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

M2M SOLUTIONS LLC,

Plaintiff,

v.

SIERRA WIRELESS AMERICA, INC., *et al.,*

Defendants.

C.A. No. 14-1102-RGA

PLAINTIFF M2M SOLUTIONS LLC'S
PRELIMINARY INFRINGMENT CONTENTIONS

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

May 15, 2015

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Claim Element		Infringement Support
1.	A programmable communicator device comprising:	AirPrime embedded wireless module products are communicator devices that Sierra Wireless characterizes as "the industry's broadest portfolio of wireless modules for mobile computing and M2M [communications applications] . . . that is just right for your specific connectivity needs." (AirPrime Embedded Wireless Modules Datasheet, p. 2) Sierra Wireless provides a software suite which allows for the development of M2M applications using the module. The AR Series modules are programmable via ANSI C/C++ and/or Lua scripting and/or standard and proprietary AT commands. (Sierra_Wireless_AirPrime_AR_Series_ Automotive_Wireless_Modules.pdf, p. 2) (Sierra Wireless Software Suite http://www.sierrawireless.com/ productsandservices/AirPrime.aspx p. 1)
1.a	a programmable interface for establishing a communication link with at least one monitored technical device, wherein the programmable interface is programmable by wireless packet switched data messages; and	The AR Series 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 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.

Claim Element	Infringement Support
	These interfaces are capable of forming a communication link with any number of different types of monitored technical devices such as sensors, switches, actuators, and programmable logic controllers. (AirVantage Platform Technical Brief.pdf, 2010, p. 6) (AirVantage Development Tools for Quick Data Retrieval from General Electric Meters Technote, 2011, p. 6) (ALEOS 4.4.0 Software Configuration, Rev. 1, p. 6) (AirLink GX Series Hardware User Guide, Rev. 3, pp. 7-10, 33-43) AR Series modules have one or more serial interfaces designated as UART1 and UART2. These interfaces are programmable in Sierra Wireless modules via AT commands that include the **ATE**, **AT&C**, **AT&D**, and **AT+IPR** commands. (Sierra_Wireless_AirPrime_AR_Series_ Automotive_Wireless_Modules.pdf, p. 2) (AT Commands Interface Guide For Firmware 7.45, Rev. 019, Vol. 1, pp. 167-171, 181-84) AR Series modules have multiple General Purpose I/O ("GPIO") pin interfaces. These interfaces are programmable in Sierra Wireless modules via AT commands that include the **AT+WIOW**, **AT+WIOM**, and **AT+WIPC** commands. (Sierra_Wireless_AirPrime_AR_Series_ Automotive_Wireless_Modules.pdf, p. 2) (AT Commands Interface Guide For Firmware 7.45, Rev. 019, Vol. 4, pp. 106-117) AR Series modules have two Analog to Digital Converter ("ADC1" and "ADC2") interfaces. These interfaces are programmable in Sierra Wireless modules via AT commands that include the **AT+ADC** command. (Sierra_Wireless_AirPrime_AR_Series_ Automotive_Wireless_Modules.pdf, p. 2) (AT Commands Interface Guide For Firmware

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	7.45, Rev. 019, Vol. 4, pp. 118-120) AR Series modules have firmware that is capable of operating with the AirVantage Platform from Sierra Wireless. The AirVantage Platform provides the ability to remotely monitor, control, and upgrade the AR Series modules in the field. (Sierra_Wireless_AirPrime_AR_Series_ Automotive_Wireless_Modules.pdf, p. 2) The AirVantage Platform is able to communicate remotely with the AR Series module over a TCP connection and send wireless AT commands which are executed by the module and the responses are sent back to the AirVantage Platform. Therefore, each of the AT commands identified above for programming the interface can be run remotely, meaning that the AR Series modules are able to directly process and execute these programming commands when received in incoming wireless transmissions sent to the modules by remote devices. (AT Commands Over AirVantage Management Services Application Note, p. 1) 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	The AR Series 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

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