IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

M2M SOLUTIONS LLC,

    Plaintiff,

  v.

SIERRA WIRELESS AMERICA, INC.,
and SIERRA WIRELESS, INC.,

    Defendants.

Civil Action No. 12-30-RGA

M2M SOLUTIONS LLC,

    Plaintiff,

  v.

ENFORA, INC., NOVATEL WIRELESS
SOLUTIONS, INC., and NOVATEL
WIRELESS, INC.,

    Defendants.

Civil Action No. 12-32-RGA

VOLUME I of II

VIDEOTAPED DEPOSITION OF KEVIN J. NEGUS, Ph.D.

Taken at:

Comfort Inn

75 Baxter Lane

Butte, Montana

May 21, 2015

9:10 a.m.

1   (A brief record was taken.)

2   VIDEOGRAPHER: This is Tape 8 of the

3   videotaped deposition of Kevin Negus.

4   The time is 5:38 p.m. We're on the record.

5   BY MR. HENSCHKE:

6   Q.   In May of 2000, would a person of ordinary

7   skill have been familiar with the infrared data

8   association, IrDA specification, that cover serial

9   infrared optical communication links?

10   A.   I would certainly include it. I knew it very

11   well. I was involved with it. And it was actually

12   written at my division at Hewlett Packard.

13   Q.   And a person of ordinary skill would have

14   understood that the data transmissions that are made over

15   a serial infrared link did not involve any packet

16   switching, correct?

17   A.   No, I don't believe that would be their

18   understanding. There was nothing in IrDA that would

19   preclude packet-switched messages from traversing over the

20   link. I've certainly used IrDA back at that time frame to

21   pass information that would include packet-switched

22   messages.

23   Q.   But there was -- there would have been no

24   packet switching occurring over the infrared link,

25   correct?

1   A.   Packet switching doesn't occur over any link

2   in any media. That's not what packet switching is.

3   Packet switching is a reference to routing. Routing

4   occurs at routers, not over a link. So routing, routing

5   has nothing to do with the link.

6   Perhaps you don't understand the difference between

7   Layer 2 and Layer 3 and the protocol. Packet switching is

8   a reference to Layer 3 and to routing; a link is a

9   reference to Layer 2, so which Layer 2 is the link layer.

10   And so IrDA, you're taxing my memory a little, but I

11   believe IrDA like, for example, 802.11, Wi-Fi, everybody

12   knows Wi-Fi is wireless.

13   Everybody knows Wi-Fi with their router and being

14   packet switched, but Wi-Fi, like IrDA, is just a Layer 2

15   and Layer 1 protocol. There is no Layer 3 described in

16   any of the IEEE standards that we call "Wi-Fi," or in

17   IrDA. So just as you can do packet-switch stuff over

18   Wi-Fi, you can equally do it over IrDA, or GSM, or IS-54,

19   or CDPD, or any number of link-layer standards.

20   Q.   Do the GPRS standards that you cite in your

21   expert report, those would be the GSM 03.60 and the GSM

22   07.60, do those, in your opinion, teach a mobile equipment

23   device that has the capability to process the data content

24   of a GPRS data message?

25   MS. BRANN: Objection; form.