

Paper No. _____

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SIERRA WIRELESS AMERICA, INC.; SIERRA WIRELESS, INC.;
and RPX CORP.,
Petitioners,

v.

M2M SOLUTIONS LLC,
Patent Owner.

Case IPR2015-01823
Patent 8,648,717

SECOND DECLARATION OF MICHELLE A. MORAN

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P.O. Box 1450
Alexandria, VA 22313-1450

Declaration of Michelle A. Moran
Inter Partes Review of U.S. Patent No. 8,648,717

1. I, Michelle A. Moran, resident of Waukesha, WI, hereby declare as follows:

2. I am an attorney at Foley & Lardner LLP and one of the attorneys for the patent owner in this *inter partes* review.

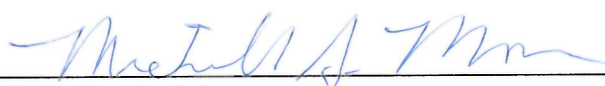
3. On information and belief, the Exhibits submitted with the Patent Owner's Response for the above-referenced *inter partes* review as Exhibits 2008-2015, 2017, and 2019 are true and correct copies of the original documents and Exhibits 2016 and 2018 are true and correct copies of excerpts of the original documents as show in the table below.

Ex. #	Exhibit
2008	Memorandum Opinion Denying Sierra's Summary Judgment Motion, dated March 31, 2016, M2M Solutions LLC v. Sierra Wireless America, et al., Case No. 12-030-RGA (DED)
2009	'010 <i>Markman</i> Opinion dated November 12, 2013, M2M Solutions LLC v. Sierra Wireless America, et al., Case No. 12-030-RGA (DED)
2010	Joint Claim Construction Statement filed on August 14, 2015, M2M Solutions LLC v. Sierra Wireless America, et al., Case No. 1:14-01001-RGA (DED)
2011	Expert Declaration of Joel R. Williams, dated May 25, 2016
2012	ISO/IEC 7816-3
2013	3G TS 22.038, SIM Application Toolkit (SAT); Service Description; V. 2.0.0 (1999-10)
2014	Supplemental Amendment during prosecution of application that became the '717 patent, dated November 8, 2013
2015	3rd Generation Partnership Project; Point-to-Point (PP) Short Message Service (SMS) Support On Mobile Radio Interface; 3G TS 24.011 V3.2.0 (2000-03 Release 1999)
2016	Excerpts of the deposition of Dr. Negus, M2M Solutions LLC v.

	Sierra Wireless America, et al., Case No. 12-030-RGA (DED), dated 5/21/15
2017	Transcript of deposition of Dr. Negus, M2M Solutions LLC v. Sierra Wireless America, et al., Case No. 12-030-RGA (DED), dated 5/17/16
2018	Excerpts of the Negus Invalidity Expert Report, M2M Solutions LLC v. Sierra Wireless America, et al., Case No. 12-030-RGA (DED), dated 5/5/14
2019	U.S. Patent No. 8,094,010

4. I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that all statement made of my own knowledge are true and that all statements made on information and belief are believed to be true. I understand that willful false statements and the like are punishable by fine or imprisonment, or both (18 U.S.C. § 1001).

Executed this 25th day of May, 2016



 Michelle A. Moran