

**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 ON THE
INVALIDITY OF U.S. PATENT NO. 8,094,010**

I have been retained by Telit Communications PLC (“Telit PLC”) and Telit Wireless Solutions Inc. (“Telit Wireless”) (collectively with Telit PLC, “Telit”), Motorola Solutions, Inc. and Kowatec Corporation (“Kowatec”) 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.¹

¹ This report constitutes notice under 35 U.S.C. §282. Defendants reserve the right to rely on prior art, invalidity contentions or information contained in the expert reports submitted by other defendants against which M2M asserted the ‘010 Patent.

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1. EXHIBIT LISTING
 - A. Claim Chart for the Hotlink Business Case
 - B. Claim Chart for U.S. Patent No. 6,463,474
 - C. Claim Chart for the Raven Airlink
 - D. Claim Chart for GSM 11.14
 - E. Claim Chart for Telital GM360
 - F. Claim Chart for WO 00/017021

I. BACKGROUND

1. From 1985 – 1990 I attended the Raahe Institute of Computer Technology, Raahe, Finland where I earned a Bachelor of Science degree, with a major in electrical engineering, focused on embedded environments, and a minor in programming in embedded environments. From 1991 - 1996 I attended the University of Oulu, Finland where I earned a Master of Science degree in Computer Science.

2. From November 1994 to May 2006, I was employed by Nokia. From 1994-1998, I served as Product Program Manager at Nokia's Oulu, Finland facility. In that capacity, I successfully managed up to four simultaneous product programs in M2M (machine-to-machine) terminal product creation and related server software product creation. I also managed up to 100 people in three R&D sites. During this period of time, I was involved in and supervised the development of Nokia's wireless payphone (Ex. 1) and payphone management system, including: writing "C" code for the project; designing electrical circuitry; writing technical specifications; and writing protocol specifications for the wireless transaction protocol (WTP).

3. From 1994-1998, I served as an R&D Line Manager (Nokia Elektrobit Products (NEP), Oulu), Project Manager (NEP, Oulu, Finland) (including managing GSM type approval testing and certification processes, and was named as an inventor on several patent applications, two of which were approved in the US), Software Chief Designer (NEP, Oulu, Finland), and Hardware Designer (NEP, Oulu, Finland).

4. From 1998-2002, I was involved in the development of Nokia's M2M connectivity terminal, the Nokia 20, and the M2M gateway (Ex. 2). The connectivity terminal and gateway were designed to be sold together. In connection with this project, I led the design

team, wrote technical and protocol specifications, and communicated customer requirements to the design team.

5. Also while at Nokia, I served as Business Development Manager at Nokia's Oulu, Finland facility. In that capacity, I conducted an extensive market study of the M2M market around the world, interviewing over 100 systems integrators and vendors working on this market. I also translated market requirements to product requirements and wrote product specifications to allow Nokia to enter the market.

6. From 2003-2004, I served as General Manager for Nokia's M2M business worldwide. In this capacity, I had global responsibility of the M2M business area in Nokia, including product development. I was nominated as one of the ten pioneers of the M2M industry by the M2M Magazine in July 2004. (Ex. 3)

7. During this timeframe, I served as Program Manager in Nokia's Dallas, Texas facility. In that role, I developed sales channels and collaboration networks with various companies working in the M2M business, including system integrators, hardware and software vendors, distributors, consultants, and install companies. I also involved the GSM carriers in the M2M business, managed the collaborator network and worked together with Nokia offices in Latin America to create the M2M market.

8. I also successfully managed the transfer of Nokia's M2M business area and products to Aplicom Ltd in 2004.

9. From 2004-2005, I served as Senior Business Manager (Oulu) for Spain, France, Portugal and Benelux, for the Nokia 770 Internet Tablet. In this capacity, I was responsible for developing retail sales channels, cooperating with Telecom companies and partnering with ISPs.

10. After my time at Nokia, from May 2006 to January 2008, I served as Director of Business Development for Elektrobit, in Oulu, Finland and Washington, DC/Seattle, Washington, where I was responsible for overall project management. Elektrobit is a research and development company. While at Elektrobit, I oversaw a project for TerraStar Networks, in Reston, Virginia, for developing a handset capable of satellite communication as well as LTE communication.

11. Since January 2008, I have been employed by Anite Plc., where I serve as Vice President of Engineering. I previously was Vice President for Sales Support and Product Management in Anite's Oulu, Finland facility. I also served as Vice President of Technical Support and Sales Support in Anite's Forest, Virginia facility. Anite manufactures test tools for wireless carriers such as AT&T and T-Mobile. I am responsible for, among things, global engineering activities, and process development. My curriculum vitae is attached as Exhibit 4.

12. In addition to those patents referenced earlier, I am a named inventor or co-inventor on U.S. Patent No. 6,108,531, entitled "Terminal equipment providing payment data in a cellular radio system" (Ex. 5); U.S. Patent No. 6,327,466, entitled "Method and arrangement for setting the charge rate in a wireless pay phone" (Ex. 6); International Patent Publication No. WO 99/57875, entitled "Method of Updating Terminal Software in a Telephone System" (Ex. 7); International Patent Publication No. WO 99/20070, entitled "Method of Installing a Terminal, and a Wireless Telephone System" (Ex. 8); and International Patent Publication No. WO 96/42175, entitled "Method and Terminal Equipment for Transmitting Information Not Relating To A Call" (Ex. 9).

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