Exhibit 2

Exhibit A35 to Hughes Invalidity Contentions

<u>**Invalidity Chart for U.S. Patent No. 7,245,874 Based on Nokia**</u>

As set forth below, Hughes contends that European Patent Application No. 0,852,448 A1 of Nokia Mobile Phones LTD ("Nokia") anticipates one or more claims of U.S. Patent No. 7,245,874 ("the '874 Patent") or renders '874 Patent obvious, either alone or in conjunction with other prior art. The '874 Patent was filed on August 1, 2001, and makes no claim to an earlier priority date. Nokia is, on its face, prior art to the '874 Patent at least under 35 U.S.C. § 102(a), (b), and (e) as of its 1998 publication date.

Defendants' contentions are based upon information available to it at the time of serving these contentions. In the absence of a claim construction order from the Court, Defendants have based the invalidity contentions on the broadest reasonable interpretation of the claim language itself[1] or the meaning ascribed to the claim by Plaintiff in its infringement contentions (which in some instances is broader). Defendants' disclosures do not reflect, and nothing in these disclosures should be construed as reflecting, Defendants' endorsement or assertion of any particular claim construction. Defendants reserve the right to propose alternative claim constructions and to challenge claim constructions offered by Plaintiff.

In the following claim charts, Defendants have cited representative portions of the identified reference, even where the cited reference may contain additional support for a particular claim element. Persons of ordinary skill in the art would have known to read references as a whole, and in the context of other publications and literature and the knowledge of one of ordinary skill in the art. Defendants may rely on all such information, including uncited portions of the prior art references listed herein and on other publications and testimony to provide context and as aids to understanding and interpreting the listed references. Furthermore, Defendant may rely on all such information to establish that a person of ordinary skill in the art would have been motivated to modify or combine any of the cited references so as to render the claims obvious. Additionally, citations to a particular figure in a prior art reference encompass all text relating to the figure, and citations to text encompass all figures relating to that text.

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[1] *See*, *e.g.*, MPEP § 2111 (8th ed., 8th rev. 2010).

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Mark	'874 Claim Limitation	Invalidity Analysis
1	**A branch of a cellular telephone network based on a first synchronous data communication protocol, comprising**	Nokia discloses a branch of a cellular telephone network based on a first synchronous data communication protocol. For example, "The present invention relates to mobile communications." [Nokia, 1:3-4] "In one aspect, the present invention is primarily concerned with mobile communications in which multiple backbone networks are accessible via one or more common protocol radio access networks, and the backbone networks operate using technically incompatible communications protocols." [Nokia, 1:53-58] "Referring to Figure 1, a mobile communications system comprises a mobile terminal 10 (e.g. a digital cellular telephone or personal digital assistant (PDA)); three radio access networks 20a;20b;20c and three backbone networks 30a,30b,30c." [Nokia, 4:12-16] "However, the present invention is not limited to these protocols but it extends also to other currently known protocols such as DAMPS, PDC, DCS 1800, and modifications thereof, whether these are based on synchronous or asynchronous protocols and to completely new protocols which may be developed." [Nokia, 9:24-30] Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
1a	**interfaces to a satellite link using a second, asynchronous, data communication protocol,**	Nokia discloses interfaces to a satellite link using a second, asynchronous, data communication protocol. For example, "However, the present invention is not limited to these protocols but it

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		extends also to other currently known protocols such as DAMPS, PDC, DCS 1800, and modifications thereof, whether these are based on synchronous or asynchronous protocols and to completely new protocols which may be developed." [Nokia, 9:24-30] Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
1b	**wherein said interfaces comprise converters for converting data of a datastream between said first data communication protocol and said second data communication protocol,**	Nokia discloses said interfaces comprising converters for converting data of a datastream between said first data communication protocol and said second data communication protocol. For example, "One way of implementing such systems would be to provide a full set of protocol converters within the radio access network (for example, at a point corresponding to the BCS of a GSM network) and to allow the mobile terminal to communicate using a single stack of high and low level protocols. Protocol conversion would then be handled invisibly from the mobile terminal, which could be of simple construction. This is the approach which has in the past been used, for example, when specifying the interworking between DECT (digital European cordless telephony) and GSM systems." [Nokia, 2:1-11] "The digital signal processor device 13 performs data formatting (for example into packets, ATM cells or a TOM bit stream and into a frame structure);" [Nokia, 4:30-33] Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders

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Mark	'874 Claim Limitation	Invalidity Analysis
		it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
1c	and wherein said synchronous data protocol allows non-data carrying time slots,	Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
1d	and said interfaces comprising a non-data carrying time slot remover for removing said non-data carrying time slots during conversion into said asynchronous protocol	Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
1e	and a time slot regenerator for regenerating non-data carrying time slots during reconstruction of said datastream.	Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
2	The branch of claim 1, being one of peripheral branches of a telephone network,	Viewing Nokia as a whole and in view of other prior art, this element would have been inherent or obvious to one of ordinary skill in the art. To the extent it is found that the element is not expressly disclosed in Nokia, Nokia renders it obvious, either alone, in combination with the knowledge of a person of ordinary skill in the art, and/or in combination with other prior art references identified in the cover pleading or herein.
2a	the peripheral branches being connected to a central high-capacity data trunking region and,	Nokia discloses the peripheral branches being connected to a central high-capacity data trunking region. For example, "These MSC's, together with the physical links (e.g. fibre optic cables) which interconnect them, make up a backbone network, through which voice calls,

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