

Case No. IPR2025-01026

Patent No. 11,031,677

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GEOTAB INC. AND GEOTAB USA, INC.,
Petitioners,

v.

FRACTUS, S.A.,
Patent Owner.

Case No. IPR2025-01026

Patent No. 11,031,677

**PATENT OWNER'S MOTION FOR *PRO HAC VICE*
ADMISSION OF LARRY L. SHATZER**

EXHIBIT LIST

Exhibit No.	Title
Ex. 2001	PACER Docket Reports from July 28, 2025 in <i>Fractus, S.A. v. Verizon Connect Inc. et al</i> , 2:24-cv-01009-JRG-RSP (E.D.Tex.) and <i>Fractus, S.A. v. Geotab Inc.</i> 2:24-cv-01008-JRG-RSP (E.D.Tex.)
Ex. 2002	Defendants' Preliminary Invalidation Contentions dated June 18, 2025 in 2:24-cv-01009-JRG-RSP (E.D.Tex.)
Ex. 2003	Invalidity Contentions for U.S. Patent No. 11,031,677 in 2:24-cv-01009-JRG-RSP (E.D.Tex.)
Ex. 2004	Amended Docket Control Order dated April 10, 2025 in 2:24-cv-01009-JRG-RSP (E.D.Tex.)
Ex. 2005	Complaint dated December 6, 2024 in 2:24-cv-01008-JRG-RSP (E.D.Tex.)
Ex. 2006	Docket Navigator Time to Trial Statistics for Judge Rodney Gilstrap (last accessed July 23, 2025)
Ex. 2007	Declaration of Mark J. DeBoy
Ex. 2008	DECLARATION IN SUPPORT OF PATENT OWNER'S MOTION FOR <i>PRO HAC VICE</i> ADMISSION OF LARRY L. SHATZER

Pursuant to 37 C.F.R. § 42.10, Patent Owner, Fractus, S.A. respectfully requests the Board to recognize Larry L. Shatzer as *pro hac vice* counsel for the Patent Owner in this proceeding.

I. Time for Filing

Pursuant to Paper 8, Notice of Filing Date Accorded to Petition in the present case (Case IPR2025-01026) (“Notice”), this motion for *pro hac vice* admission is authorized and is being filed no sooner than twenty-one (21) days after service of the petition.

II. Good Cause for Additional Back-Up Counsel

Patent Owner respectfully requests admission of Mr. Shatzer as back-up counsel to provide additional expertise during this process, particularly due to his familiarity with the substantive, technical and legal issues involved in this proceeding.

III. Statement of Facts

Pursuant to the Notice, the following statement of facts, supported by the attached Declaration of Mr. Shatzer, show that there is good cause for the Board to recognize Mr. Shatzer *pro hac vice*.

Lead counsel for this proceeding, Mark DeBoy, is a registered practitioner (Reg. No. 66,983).

Back-up Counsel for this proceeding, Patrick Finnan, is a registered practitioner (Reg. No. 39,189).

Mr. Shatzer is an experienced intellectual property litigation attorney and has served as lead counsel in numerous complex patent infringement litigations in various districts.

Mr. Shatzer has not been suspended or disbarred from practice, and he has not had any application for admission of practice denied or had any sanctions or contempt citations imposed against him.

Mr. Shatzer is an active member in good standing of the bars of Maryland, the District of Columbia and Tennessee, and, as set forth in his Declaration, is admitted to practice before several Federal Courts, including the Supreme Court of the United States and the United States Court of Appeals for the Federal Circuit. Mr. Shatzer's mailing address is Edell Shapiro and Finnan, LLC, 9801 Washingtonian Blvd., Suite 750, Gaithersburg, MD 20878. His email address is lshatzer@esfip.com, and his direct dial phone number is 240-864-2471.

Mr. Shatzer has worked extensively with the Patent Owner in the past and is familiar with the specific technology at issue in the petition. He is familiar with the patent at issue and has extensive knowledge of the assertions regarding validity of the challenged claims. He is also familiar with the Patent Owner's overall legal strategies and has in-depth knowledge of issues that may arise over the course of

the proceeding. Mr. Shatzer has established familiarity with the subject matter at issue in this proceeding.

Mr. Shatzer has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of the C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. § 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

Mr. Shatzer has appeared in following other proceedings before the United States Patent and Trademark Office in the last three (3) years:

- IPR2024-00087;
- IPR2024-00088;
- IPR2024-00089; and
- PGR2025-00031.

Patent Owner relies on Mr. Shatzer in the development of its legal strategy with respect to this patent, and Patent Owner wishes Mr. Shatzer to represent it in this proceeding.

IV. Affidavit or Declaration of Individual Seeking to Appear

This motion for *pro hac vice* admission is accompanied by a Declaration of Mr. Shatzer as required by the Order, filed as Exhibit 2008.

V. Conclusion

The facts contained in the Statement of Facts above, and contained in the Declaration of Mr. Shatzer, establish that there is good cause to admit Mr. Shatzer *pro hac vice* in this proceeding under 37 C.F.R. § 42.10(c).

Dated: September 8, 2025

Respectfully submitted,

/Mark J. DeBoy/

Mark J. DeBoy (Reg. 66,983)

Attorney Patent Owner

Fractus, S.A.

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF LARRY SHATZER and accompanying EXHIBIT 2008** were served via email (as previously consented to by counsel) on September 8, 2025 to lead and backup counsel of record for Petitioners as follows:

AWichman-PTAB@wolfgreenfield.com
MParsons-PTAB@wolfgreenfield.com
RGiunta-PTAB@wolfgreenfield.com
SLu-PTAB@wolfgreenfield.com

Dated: September 8, 2025

/Mark J. DeBoy/

Mark J. DeBoy (Reg. No. 66,983)
Attorney for Patent Owner
Fractus, S.A.