

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 11,031,677

**PATENT OWNER'S OBJECTIONS TO EVIDENCE SERVED BEFORE
INSTITUTION**

Under the Federal Rules of Evidence and 37 C.F.R. § 42.64, Patent Owner Fractus. S.A. (hereinafter “Patent Owner”), timely objects to evidence submitted by Geotab Inc. and Geotab USA Inc. (hereinafter “Petitioners”) prior to institution of the trial in IPR2025-01026. Patent Owner serves Petitioners with these objections to provide notice that Patent Owner may move to exclude the challenged exhibits under 37 C.F.R. § 42.64(c) unless Petitioners cure the defects associated with the challenged exhibits identified below.

I. Exhibits 1007, 1014 and 1027

Patent Owner objects to Exhibits 1007, 1014 and 1027 in their entirety under Fed. R. Evid. 702 and/or 802 as the declarants have not yet been made available for examination during a deposition.

II. Exhibits 1025, 1026, 1031-1039, 1041-1046, 1090 and 1091

Patent Owner objects to each of Exhibits 1025, 1026, 1031-1039, 1041-1046, 1091 and 1092 under Fed. R. Evid. (“Rule”) 901(a) for lack of authentication and foundation.

Dated: December 17, 2025

Respectfully submitted,
/Mark J. DeBoy/
Mark J. DeBoy (Reg. 66,983)
Attorney for Patent Owner, Frapctus 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 OBJECTIONS TO EVIDENCE SERVED BEFORE INSTITUTION** was served via email (as previously consented to by counsel) on December 17, 2025 to lead and backup counsel of record for Petitioners as follows:

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Dated: December 17, 2025

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