

UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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

v.

FRACTUS, S.A.  
Patent Owner.

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Case No. IPR2025-01026  
Patent No. 11,031,677

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**PETITIONERS' OBJECTIONS TO EVIDENCE  
SERVED BEFORE INSTITUTION**

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners submit the following objections to evidence submitted during a preliminary proceeding in connection with Patent Owner’s Preliminary Response (Paper 12) (“POPR”) on October 1, 2025. These objections have been timely filed and served within ten business days of the December 3, 2025 institution of the trial.

**I. EXHIBITS 2011-2016**

Petitioners object to each of Exhibits 2011-2016 under Fed. R. Evid. (“Rule”) 901(a) for lack of authentication and as lacking foundation.

Petitioners object to these exhibits as not relevant to a disputed issue under Rule 401 and therefore inadmissible under Rule 402. EX2011-EX2016 are also not relevant under Rule 401, and inadmissible under Rule 402, because Patent Owner has also failed to establish that any of EX2011-EX2016 is prior art to any challenged claim in the ’677 patent.

Respectfully submitted,  
*Geotab Inc. and Geotab USA, Inc.*

Date: December 17, 2025

/Adam R. Wichman/  
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**CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)**

I certify that on December 17, 2025, a copy of the foregoing document, including any exhibits filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

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Date: December 17, 2025

/MacAulay Rush/  
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