

From: [Albert, Michael](#)
To: [Jordi Ilario | Fractus](#)
Cc: ["Francisco Lopez"; Keeton, Hunter](#)
Subject: Re: Fractus demand letter to Geotab USA, Inc.
Date: Tuesday, January 25, 2022 11:32:33 AM
Attachments: [image001.jpg](#)
[image002.jpg](#)
[image003.jpg](#)
[image004.png](#)

Dear Mr. Ilario,

I understand your intent with regard to the proposed NDA. Nevertheless, an NDA is a contractual relationship that imposes certain risks, liabilities, and potential claims on the parties to it. As of now, Geotab is aware of no reason to believe that it has any duties or obligations to Fractus and it does not wish to enter into any such contractual relationship.

Additionally, inasmuch as your patent is public information and your claim chart would presumably compare its elements to the features of some Geotab product, it is difficult to understand in what way any such analysis would require the disclosure of information over which Fractus could legitimately claim confidentiality.

Accordingly, if you wish to proceed further with this discussion, I would suggest that you provide us with any claim charts or other information that you can share regarding your alleged claims against Geotab that do not require confidential treatment under an NDA.

Best regards,

Michael Albert

malbert@WolfGreenfield.com

Direct Dial 617.646.8240

Wolf, Greenfield & Sacks, P.C.

600 Atlantic Avenue | Boston, MA 02210-2206

www.WolfGreenfield.com

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From: Jordi Ilario | Fractus
Sent: Thursday, January 13, 2022 5:06 AM
To: Albert, Michael
Cc: 'Francisco Lopez'; Keeton, Hunter
Subject: RE: Fractus demand letter to Geotab USA, Inc.

Dear Mr. Albert,

Thank you for your email below.

Fractus intends to share claim charts and technical information that is not previously publicly known, neither in general nor in detail. The purpose of the NDA is to prevent disclosure of said confidential information to any third party without the prior written approval of the other party.

I hope you understand this and can agree to continue the discussion under this framework.

Best regards,



Jordi Ilario

COO and Vice President, Licensing
Alcalde Barnils, 64-68, Modul A, 3a pl
08174 – Sant Cugat del Valles
www.fractus.com
Tel: +34.93.544.2690

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De: Michael Albert

Enviado el: lunes, 10 de enero de 2022 22:36

Para: Jordi Ilario | Fractus

CC: 'Francisco Lopez' ; Hunter Keeton

Asunto: RE: Fractus demand letter to Geotab USA, Inc.

Dear Mr. Ilario,

Thank you for your response below.

We do not see any need for Geotab to enter into an NDA or other contractual relationship merely to be told what Fractus's claims are. Any claim charts Fractus has would be based on public documents, or on analyzing publicly-available samples, and so would not require an NDA to be shared.

Accordingly, should Fractus wish to pursue this discussion further, we again ask that Fractus provide claim charts providing the information omitted from Mr. Bonet's October 15th letter, so that Geotab can understand the basis for Fractus's claims.

Best regards,

Michael

Michael Albert

Shareholder
Admitted to Practice: MA
617.646.8240



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600 Atlantic Avenue | Boston, MA 02210
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From: Jordi Ilario | Fractus <jordi.ilario@fractus.com>

Sent: Tuesday, December 14, 2021 5:48 AM

To: Albert, Michael <Michael.Albert@WolfGreenfield.com>

Cc: Rutt, Eric <Eric.Rutt@WolfGreenfield.com>; 'Francisco Lopez' <francisco.lopez@fractus.com>

Subject: RE: Fractus demand letter to Geotab USA, Inc.

Dear Mr. Albert,

Thank you very much for your email and letter dated November 16, 2021, to Mr. Bonet, which has been forwarded to me for follow-up.

We are happy to provide more information regarding Geotab's infringement of Fractus's patents, particularly regarding the products identified in Exhibit I to our letter dated October 28, 2021. Fractus has prepared claim charts for the products identified in Exhibit I. We shall be happy to share those charts and more information regarding the technology and Geotab's use of the technology. Please find enclosed our standard NDA to protect the exchange of information. We appreciate your time and attention to these issues and look forward to continuing this discussion.

Best regards,



Jordi Ilario

COO and Vice President, Licensing
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De: Michael Albert <Michael.Albert@WolfGreenfield.com>

Enviado el: martes, 16 de noviembre de 2021 7:08

Para: ruben.bonet@fractus.com

CC: Eric Rutt <Eric.Rutt@WolfGreenfield.com>

Asunto: Fractus demand letter to Geotab USA, Inc.

Dear Mr. Bonet,

Please see attached letter.

Sincerely,

Michael Albert

malbert@WolfGreenfield.com

Direct Dial 617.646.8240

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