



**Service of Process
Transmittal**

11/02/2021
CT Log Number 540520785

TO: Matthew Donnelly
GEOTAB USA, Inc.
7180 POLLOCK DR
LAS VEGAS, NV 89119-9003

RE: Process Served in Delaware

FOR: Geotab USA, Inc. (Domestic State: DE)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Mr. Laurence Prystawski vs. Geotab USA, Inc.

DOCUMENT(S) SERVED: --

COURT/AGENCY: None Specified
Case # None Specified

NATURE OF ACTION: Intellectual Property Litigation - Patent infringement

ON WHOM PROCESS WAS SERVED: The Corporation Trust Company, Wilmington, DE

DATE AND HOUR OF SERVICE: By Courier on 11/02/2021

JURISDICTION SERVED : Delaware

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780137789431
Image SOP
Email Notification, Matthew Donnelly matthewdonnelly@geotab.com
Email Notification, Laurence Prystawski laurenceprystawski@geotab.com

REGISTERED AGENT ADDRESS: The Corporation Trust Company
1209 Orange Street
Wilmington, DE 19801
866-539-8692
CorporationTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

SHIP DATE: 29OCT21
ACTWTG: 0.10 KG
CAD: 9678785/INET 4344

BILL SENDER

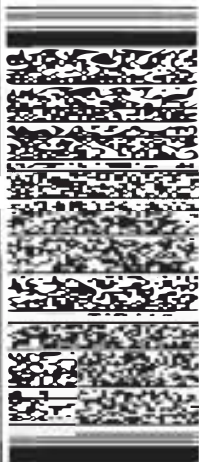
ORIGIN ID: BICMT8 0034935442680
FRUITEN BOUWET
FRAC TULUS SA
AVDA AL CALDE DE BARNILLS, 64-68
EDIFICIO TESTA, MODULO A, PLANTA 3
SANT CUGAT DEL VALLE, 08174
SPAIN ES

TO: MR. LAURENCE PRYSTAWSKI
GEOTAB USA, INC.
C/O THE CORPORATION TRUST COMPANY
1209, ORANGE STREET
CORPORATION TRUST CENTER
WILMINGTON DE 19808

REF: (800) 677-3394

INV.

PO:



FedEx
EXPRESS

(US)

10:30A
INTL PRIORITY
ASR
19808
PHL
DE-US

TRK# 7750 6340 4259

0430

XBILGA



Después de imprimir esta etiqueta,
COPIA PARA EL CONSIGNATARIO - POR FAVOR, COLOCAR EN LA PARTE DELANTERA DE LA BOLSA
1. Coloque la etiqueta en la bolsa de envío y péguela a su envío.

MR. LAURENCE PRYSTAWSKI
GENERAL COUNSEL
GEOTAB USA, Inc.

c/o The Corporation Trust Company
1209, Orange street
Corporation Trust Center
Wilmington, DE 19801
USA



Avda. Alcalde Barnils, 64-68
Sant Cugat del Valles
08174 Barcelona, Spain

Tel: +34 935 442 690
contact@fractus.com
www.fractus.com



Avda. Alcalde Barnils, 64-68
Sant Cugat del Valles
08174 Barcelona, Spain

Tel: +34 935 442 690
contact@fractus.com
www.fractus.com

October 28, 2021

Via Federal Express

Mr. Laurence Prystawski, General Counsel
Geotab USA, Inc.
c/o The Corporation Trust Company
1209 Orange Street
Corporation Trust Center
Wilmington, DE 19801
USA
Tel.: 800-677-3394

Subject: Notice of infringement

Dear Mr. Prystawski,

I am writing to initiate a discussion regarding Geotab USA, Inc.'s ("Geotab") infringement of Fractus S.A.'s ("Fractus") patented technology.

Fractus is a Spanish company that is an early pioneer in the development of internal antennas for smartphones, tablets, and wireless Internet of Things devices. As a result of its work, Fractus owns a very large patent portfolio covering antennas and related technology for wireless communications. In part, the patents reflect Fractus's pioneering technology that allows wireless devices to have miniature and/or multiband internal antennas, the integration of multiple antennas within the wireless device, and their integration with sensing elements used in many wireless devices. Fractus has accrued significant public recognition and many awards for its remarkable antenna innovations.

Fractus's patents cover the technology that is ubiquitously employed by sellers, manufacturers, and users of wireless devices such as Geotab. Every wireless devices, including but not limited to aftermarket telematics devices and other solutions for fleets (i.e. cameras & ADAS, connected sensors, asset and trailer tracking), that (i) incorporate a multiband and/or miniaturized wireless antenna, or integrate multiple antennas, that comprise the features recited in any of the Fractus's patents, (ii) are made, used, imported, sold, or offered for sale, or otherwise exploited by Geotab in a jurisdiction covered by any such patent, and (iii) are purchased or manufactured by a licensee of Fractus and not covered by the license to that supplier, requires a license under those patents.

Fractus has analyzed some of Geotab's products and determined that Geotab, along with its subsidiaries, affiliates, suppliers, importers, distributors, dealers, and customers, infringe Fractus's patents. In particular, Exhibit I shows several examples of Geotab's products that infringe (both directly and indirectly) specific claims of patents owned by Fractus. In addition, we understand that Geotab regularly uses infringing

A handwritten signature in black ink, consisting of a large, stylized 'C' or 'K' shape with a long horizontal stroke extending to the right.



Avda. Alcalde Barnils, 64-68
Sant Cugat del Valles
08174 Barcelona, Spain

Tel: +34 935 442 690
contact@fractus.com
www.fractus.com

products in the ordinary course of its business, for example for fleet tracking and shipment monitoring applications. The specific device(s) used by Geotab for these purposes is(are) not publicly knowable, but may include other infringing wireless devices.

To be very clear, Exhibit I provides only examples. Fractus believes that similar products likely also infringe, such as older or newer models, or distinct models, using similar technology. Exhibit II to this letter provides a list of patents that are owned by Fractus and available for license to Geotab.

Fractus's proprietary technology is valuable to companies like Geotab and is a core component of their business. That value has been recognized with more than awards and public recognition. Fractus has already licensed its technology to wireless device manufacturers around the world, including Samsung, LG, HTC, ZTE, and many others, and to network infrastructure equipment manufacturers like CommScope and others.

Fractus has a strong preference for resolving intellectual property infringement by negotiation and invites Geotab to engage in meaningful discussions to determine where the companies' interests align.

Thank you for your time and attention to this important matter, we believe that a company of your standing and reputation understands the value and importance of intellectual property rights. Please contact me with any questions or to continue this discussion. I look forward to speaking soon.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Rubén Bonet", written over a horizontal line.

Rubén Bonet
President and CEO
Fractus S.A.
ruben.bonet@fractus.com

Exhibits:

- Exhibit I: Examples of Geotab's products that infringe specific claims of patents owned by Fractus.
- Exhibit II: List of patents that are owned by Fractus as of September 30, 2021 and available for license to Geotab.

CC: Geotab USA, Inc., 7180 Pollock Drive, Las Vegas, NV 89119, USA, Tel.: 877-436-8221; Geotab USA, Inc., 770 E. Pilot Rd, Suite A, Las Vegas, NV 89119, USA, Tel.: 310-770-8187

Exhibit I (page 1/3)

Examples of Geotab's products that infringe specific claims of patents owned by Fractus

| Patent | Claim | Product | | |
|-------------------------------|-------|-------------------|-------------------------|------------------------|
| | | Geotab GO9-LTE | Geotab GO8-LTETMOBLU | FleetCarma C2G 201L |
| U.S. Patent No. 8,593,349 | 1 | X | X | |
| | 5 | X | X | |
| | 15 | X | X | |
| U.S. Patent No. 8,456,365 | 1 | X | X | |
| | 31 | X | X | |
| U.S. Patent No. 8,362,960 | 1 | X | X | |
| U.S. Patent No. 8,810,458 | 1 | X | X | |
| | 8 | X | X | |
| | 14 | | | X |
| U.S. Patent No. 7,872,605 | 1 | X | X | |
| U.S. Patent No. 8,111,199 | 21 | X | X | |
| U.S. Patent No. 11,031,677 | 1 | X | X | |





Exhibit I (page 2/3)

| Patent | Claim | Product | | |
|------------------------------|-------|-------------------|-------------------------|------------------------|
| | | Geotab GO9-LTE | Geotab GO8-LTETMOBLU | FleetCarma C2G 201L |
| U.S. Patent No. 7,471,246 | 1 | | | X |
| | 7 | | | X |
| | 9 | | | X |
| | 13 | | | X |
| | 15 | | | X |
| | 18 | | | X |
| | 27 | | | X |
| | 28 | | | X |
| | 29 | | | X |
| | 30 | | | X |

Exhibit I (page 3/3)

| Patent | Claim | Product | | |
|------------------------------|-------|-------------------|-------------------------|------------------------|
| | | Geotab GO9-LTE | Geotab GO8-LTETMOBLU | FleetCarma C2G 201L |
| U.S. Patent No. 7,907,092 | 1 | | | X |
| | 2 | | | X |
| | 3 | | | X |
| | 11 | | | X |
| | 12 | | | X |
| | 14 | | | X |
| | 26 | | | X |
| | 32 | | | X |
| | 33 | | | X |
| | 34 | | | X |



Exhibit II

List of patents that are owned by Fractus as of 09/30/2021 and available for license to Geotab

| Patent number | Patent number | Patent number | Patent number | Patent application |
|---------------|---------------|---------------|---------------|--------------------|
| US11031677 | US8581785 | US7911394 | US7015868 | US17/246192 |
| US10734723 | US8565891 | US7907092 | US6876320 | US16/913561 |
| US10644405 | US8558741 | US7872605 | PI9917493-6 | US14/694603 |
| US10644380 | US8531337 | US7791539 | MX238696 | US16/832867 |
| US10468770 | US8493280 | US7782269 | MX224686 | |
| US10355346 | US8472908 | US7688276 | KR0859580 | |
| US10320079 | US8471772 | US7675470 | KR0806654 | |
| US10135138 | US8456365 | US7554490 | JP4731519 | |
| US10056691 | US8421686 | US7541997 | JP4195070 | |
| US10056682 | US8362960 | US7528782 | JP4012733 | |
| US9899727 | US8330659 | US7505007 | IN276113 | |
| US9761948 | US8330259 | US7486242 | IN210024 | |
| US9761934 | US8259016 | US7471246 | IN203861 | |
| US9755314 | US8253633 | US7463199 | ES2410085 | |
| US9362617 | US8228245 | US7456792 | ES2314295 | |
| US9331382 | US8212726 | US7439923 | ES2288161 | |
| US9240632 | US8207893 | US7423592 | ES2246226 | |
| US9099773 | US8203488 | US7417588 | ES2241378 | |
| US9077073 | US8196829 | US7411556 | FR-EP1592083 | |
| US9054421 | US8193998 | US7403164 | NL-EP1592083 | |
| US9054418 | US8154463 | US7397431 | FR-EP1223637 | |
| US9000985 | US8154462 | US7394432 | GB-EP1223637 | |
| US8994604 | US8149171 | US7362283 | DE69924535.4 | |
| US8976069 | US8138981 | US7342553 | DE60047936.6 | |
| US8941541 | US8115686 | US7315289 | DE60022096.6 | |
| US8810458 | US8111199 | US7312762 | CN101188325 | |
| US8738103 | US8077110 | US7215287 | CN101090173 | |
| US8723742 | US8009111 | US7202822 | CN100373693 | |
| US8674887 | US7990320 | US7164386 | CN100355148 | |
| US8610627 | US7932863 | US7148850 | | |
| US8593360 | US7924226 | US7123208 | | |
| US8593349 | US7920097 | US7095372 | | |



ORIGIN: ID:BCNT 8 0034935442590
Ruben Bonet
FRAC:US SA
Avenida Alcalde Barriis, 64-68
Edificio Testa Modulo A, Planta 3
Sant. Cugat del Valle, 08174
SPAIN, ES

SHIP DATE: 29OCT21
ACTWT: 0.10 KG
CAD: 9678785/NET1344
EINWAT:

TO MR. LAURENCE PRYSTAWSKI
GEOTAB USA, Inc.
C/O The Corporation Trust Company
1209, Orange Street
Corporation Trust Center
WILMINGTON, DE 19808
UNITED STATES, US

(800) 677-3394
FedEx Express
E
J212221101820uv
(US)
AWB



TRK# 7750 6340 4259

Form 0430

XB ILGA
ASR
PKG:ENV

10:30A
INTL PRIORITY
REF: DESG:1PERSONAL_DOCUMENT
DESG2:
DESG3:
DESG4:

COUNTRY MFG: ES
CARRIAGE VALUE: 0.00 EUR
CUSTOMS VALUE: 1.00 EUR

SIGN: Ruben Bonet
TIC: S 339539642
DIT: S 339539642

For all commodities, technology or software previously exported from the United States, this was done in accordance with the Export Administration Regulations. Diversion of these items contrary to U.S. law or any other applicable country's law, prohibition, or other export control may apply and will govern and in most cases, limit the liability of Federal Express for loss or delay of or damage to your shipment. Subject to the conditions of the contract on the reverse.

Después de imprimir esta etiqueta:
COPIA DEL ALBARÁN DE FEDEX - POR FAVOR, COLOCAR DETRÁS DE LA COPIA PARA EL CONSIGNATARIO
1. Doble la página impresa a lo largo de la línea horizontal.
2. Coloque la etiqueta en la bolsa de envío y péguela a su envío.

ORIGIN ID: BCN178 0034935442690
Ruben Boetel
FRACTUS SA
Avda Alcalde Barrios, 64-68
Edificio Testa Modulo A, Planta 3
Sant Cugat del Valle, 08174
SPAIN, ES

SHIP DATE: 29OCT21
ACTWT/GT: 0.10 KG
CAD: 9878785FINET4344
BILL SENDER
ENVIAT:

TO MR. LAURENCE PRYSTAWSKI
GEOTAB USA, Inc.
CIO The Corporation Trust Company
1209, Orange Street
Corporation Trust Center
WILMINGTON, DE 19808
UNITED STATES, US

(800) 677-3394
FedEx
Express
E
(US)
AWB



TRK# 7750 6340 4259

Form 0430

XB ILGA
ASR
PKG:ENV

10:30A
INTL PRIORITY
REF: DESC:1:PERSONAL DOCUMENT
DESC2:
DESC3:
DESC4:

COUNTRY MFG: ES
CARRIAGE VALUE: 0.00 EUR
CUSTOMS VALUE: 1.00 EUR

SIGN: Ruben Boetel
T/C: S 339539642
D/T: S 339539642

For all commodities, technology or software previously exported from the United States, this was done in accordance with the Export Administration Regulations. Diversion of these items contrary to U.S. law or any other applicable country's law is prohibited. The user hereby certifies that the items described herein were not re-exported or transferred in any manner to any person and in most cases, with the liability of Federal Express, of loss or delay of or damage to your shipment. Subject to the conditions of the contract on the reverse.

Después de imprimir esta etiqueta:
COPIA DEL ALBARÁN DE FEDEX - POR FAVOR, COLOCAR DETRÁS DE LA COPIA PARA EL CONSIGNATARIO
1. Doble la página impresa a lo largo de la línea horizontal.
2. Coloque la etiqueta en la bolsa de envío y péguela a su envío.