

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. IPR2025-01027  
Patent 11,349,200

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**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 IPR2025-01027. 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, 1048, 1060, 1091 and 1092**

Patent Owner objects to each of Exhibits 1025, 1026, 1031-1039, 1041-1046, 1048, 1060, 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, 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 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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