Wolf Greenfield
INTELLECTUAL PROPERTY LAW

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BY EMAIL

Rubén Bonet
Fractus S.A.
Avda. Alcalde Barnils, 64-68
Sant Cugat del Valles
08174 Barcelona, Spain
ruben.bonet@fractus.com

Re: Fractus Notice of Infringement Letter to Geotab USA, Inc.

Dear Mr. Bonet:

This firm represents Geotab USA, Inc. ("Geotab") with regard to intellectual property matters. We are reviewing the claims made in your letter of October 28, 2021, in which Fractus S.A. ("Fractus") contends that three of Geotab's products infringe nine U.S. patents owned by Fractus.

Your letter states that Fractus has analyzed some of Geotab's products and determined that Geotab's products infringe Fractus's patents. Your letter, however, identifies only the claim number allegedly infringed without explaining how each of the three Geotab products satisfies each element of each of the 32 claims referenced in your letter. Please provide claim charts that provide this omitted information so that Geotab can understand the basis for Fractus's claims.

Very truly yours,
WOLF, GREENFIELD & SACKS, P.C.

Michael Albert

Michael A. Albert
Shareholder
Admitted to Practice: MA

Geotab Exhibit 1045
Geotab v. Fractus
IPR2025-00929