Paper No. __

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.

_____

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

_____

JOINT MOTION TO TERMINATE PROCEEDING

EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 11,031,677
1002	Prosecution History of U.S. Patent No. 11,031,677
1003	U.S. Patent No. 11,349,200
1004	Prosecution History of U.S. Patent No. 11,349,200
1005	U.S. Patent No. 12,095,149
1006	Prosecution History of U.S. Patent No. 12,095,149
1007	Declaration of Daniel van der Weide, Ph.D.
1008	Curriculum Vitae of Daniel van der Weide, Ph.D.
1009	P. Ciais, R. Staraj, G. Kossiavas, and C. Luxey. "Design of an Internal Quad-Band Antenna for Mobile Phones," *IEEE Microwave and Wireless Components Letters*, vol. 14, no. 4, pp. 148-150, April 2004 ("Ciais-Quadband").
1010	P. Ciais, R. Staraj, G. Kossiavas, and C. Luxey. "Compact Internal Multiband Antenna for Mobile Phone and WLAN Standards," *Electronics Letters*, vol. 40, no. 15, pp. 920-921, July 2004 ("Ciais-Multiband")
1011	X. Jing, Z. Du, and K. Gong. "Compact Planar Monopole Antenna for Multi-band Mobile Phones," in *2005 Asia-Pacific Microwave Conference Proceedings*, vol. 4, pp. 2657-2660, IEEE, 2005 ("Jing").
1012	H. Nakano, Y. Sato, H. Mimaki and J. Yamauchi. "An Inverted FL Antenna for Dual-Frequency Operation," *IEEE Transactions on Antennas and Propagation*, vol. 53, no. 8, pp. 2417-2421, Aug. 2005 ("Nakano")
1013	U.S. Patent App. Pub. No. 2007/0200773 ("Dou")
1014	Declaration of James L. Mullins, Ph.D.

Exhibit	Description
1015	Curriculum Vitae of James L. Mullins, Ph.D.
1016	Plaintiff's Disclosure of Asserted Claims and Infringement Contentions Against Geotab Pursuant to Local Patent Rules 3-1 and 3-2, *Fractus, S.A., v. Geotab Inc.*, No. 2:24-cv-01008 (E.D. Tex.), served March 12, 2025
1017	D.I. 75, Fractus's Opening Claim Construction Brief, *Fractus, S.A. v. ADT LLC*, No. 2:22-cv-00412 (E.D. Tex. Nov. 16, 2023)
1018	D.I. 75-1, Exhibit 1 to D.I. 75, Fractus's Opening Claim Construction Brief, *Fractus, S.A. v. ADT LLC*, No. 2:22-cv-00412 (E.D. Tex. Nov. 16, 2023)
1019	D.I. 92, Joint Claim Construction Chart, *Fractus, S.A. v. ADT LLC*, No. 2:22-cv-00412 (E.D. Tex. Jan. 4, 2024)
1020	D.I. 115, Claim Construction Order, *Fractus, S.A. v. ADT LLC*, No. 2:22-cv-00412 (E.D. Tex. Feb. 25, 2024) (Payne, M.J.)
1021	D.I. 127, Order, *Fractus, S.A. v. ADT LLC*, No. 2:22-cv-00412 (E.D. Tex. Mar. 15, 2024) (Gilstrap, D.J.)
1022	D.I. 82, Defendants ADT LLC and Vivint, Inc.'s Responsive Claim Construction Brief, *Fractus, S.A. v. ADT LLC*, No. 2:22-cv-00412 (E.D. Tex. Dec. 14, 2023)
1023	D.I. 253, Order, Fractus, S.A. v. ADT LLC, No. 2:22-cv-00412 (E.D. Tex. Oct. 4, 2024) (Gilstrap, D.J.)
1024	D.I. 1, Complaint, *Fractus, S.A., v. Geotab Inc.*, No. 2:24-cv-01008 (E.D. Tex. Dec. 6, 2024)
1025	3GPP TS 36.101 v8.4.0 (2008-12) Technical Specification: 3rd Generation Partnership Project; Technical Specification Group Radio Access Network; Evolved Universal Terrestrial Radio Access (E-UTRA); User Equipment (UE) radio transmission and reception (Release 8), 2008

Exhibit	Description
1026	Ericsson white paper, "LTE—an introduction," no. 284 23-3124 Uen Rev B (June 2009)
1027	Declaration of Gordon MacPherson
1028	'677 patent Claim Limitation Comparison Chart
1029	U.S. Patent Publication No. 2006/0214857 ("Ollikainen")
1030	ETSI TS 145 005 V4.3.0 (2001-14) Technical Specification: Digital cellular telecommunications system (Phase 2+); Radio transmission and reception (3GPP TS 45.005 version 4.3.0 Release 4)
1031	ZigBee Specification (Jun. 27, 2005)
1032	ETSI TS 125 308 V6.2.0 (2004-09) Technical Specification: Universal Mobile Telecommunications System (UMTS); UTRA High Speed Downlink Packet Access (HSDPA); Overall description; Stage 2 (3GPP TS 25.308 version 6.2.0 Release 6)
1033	ETSI TS 125 101 V6.5.0 (2004-09) Technical Specification: Universal Mobile Telecommunications System (UMTS); User Equipment (UE) radio transmission and reception (FDD) (3GPP TS 25.101 version 6.5.0 Release 6)
1034	ETSI TS 125 102 V6.0.0 (2003-12) Technical Specification: Universal Mobile Telecommunications System (UMTS); User Equipment (UE) radio transmission and reception (TDD) (3GPP TS 25.102 version 6.0.0 Release 6)
1035	ETSI TS 121 101 V6.0.0 (2004-12) Technical Specification: Universal Mobile Telecommunications System (UMTS); Technical Specifications and Technical Reports for a UTRAN-based 3GPP system (3GPP TS 21.101 version 6.0.0 Release 6)
1036	3GPP TR 23.882 V1.2.3 (2006-06) Technical Report: 3rd Generation Partnership Project; Technical Specification Group Services and System Aspects; 3GPP System Architecture Evolution: Report on Technical Options and Conclusions (Release 7)

Exhibit	Description
1037	3GPP TR 23.882 V1.6.1 (2006-11) Technical Report: 3rd Generation Partnership Project; Technical Specification Group Services and System Aspects; 3GPP System Architecture Evolution: Report on Technical Options and Conclusions (Release 7)
1038	3GPP TR 23.882 V1.8.0 (2007-02) Technical Report: 3rd Generation Partnership Project; Technical Specification Group Services and System Aspects; 3GPP System Architecture Evolution: Report on Technical Options and Conclusions (Release 7)
1039	Pages from E. Dahlman et al., *3G Evolution: HSPA and LTE for Mobile Broadband* (Academic Press 2d ed. 2008)
1040	U.S. Patent Publication No. 2008/0018543 (Baliarda-543)
1041	U.S. Department of State, *United States Delegation Report: World Radiotelecomunications Conference 2007* (2007), available at https://2001-2009.state.gov/documents/organization/108955.pdf (visited May 19, 2025)
1042	IEEE Std. 802.11a-1999, Supplement to the IEEE Standard for Information Technology—Telecommunications and information exchange between systems—Local and metropolitan area networks—Specific requirements— Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) specifications: High-speed Physical Layer in the 5 GHz Band (Dec. 30, 1999)
1043	IEEE Std. 802.11b-1999, Supplement to the IEEE Standard for Information Technology—Telecommunications and information exchange between systems—Local and metropolitan area networks—Specific requirements— Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) specifications: Higher-Speed Physical Layer Extension in the 2.4 GHz Band (Jan. 20, 2000)
1044	Specification of the Bluetooth System version 2.0, volume 2 (issued Nov. 4, 2004)

Exhibit	Description
1045	Second Report and Order, *In re Service Rules for the 698-746, 747-762 and 777-792 MHz Bands (WT Docket No. 06-150); Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems (CC Docket No. 94-102); Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones (WT Docket No. 01-309); Biennial Regulatory Review–Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services (WT Docket No. 03-264); Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission's Rules (WT Docket No. 06-169); Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band (PS Docket No. 06-229); Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010 (WT Docket No. 96-86); Declaratory Ruling on Reporting Requirement under Commission's Part 1 Anti-Collusion Rule (WT Docket No. 07-166)*, FCC 07-132 (Jul. 31, 2007), available at https://docs.fcc.gov/public/attachments/FCC-07-132A1.pdf (visited May 21, 2025)
1046	ITU, Report ITU-R M.2134-0: Requirements related to technical performance for IMT-Advanced radio interface(s) (2008), *available at* https://www.itu.int/pub/R-REP-M.2134-2008/en (visited May 22, 2025)
1047	Chart 45 to EX1016
1048	Chart 44 to EX1016
1049-1061	Reserved
1062	October 2021 Letter from Fractus to Geotab
1063	Email communications of Geotab and Fractus between November 2021 and January 2022
1064	November 2021 Letter from Geotab to Fractus
1065	Reserved

Exhibit	Description
1066	D.I. 17, Consolidation Order, *Fractus, S.A. v. Verizon*, No. 2:24-cv-01009 (E.D. Tex. Feb. 18, 2025)
1067	Federal Court Statistics June 30, 2025
1068	D.I. 34, Docket Control Order, *Fractus, S.A. v. Verizon*, No. 2:24-cv-01009 (E.D. Tex. Mar. 26, 2025)
1069	Eastern District of Texas Model Patent Order
1070	D.I. 14-1, Proof of Service of Complaint, *Fractus, S.A. v. Geotab*, No. 2:24-cv-01008 (E.D. Tex. Jan. 3, 2025)
1071	D.I. 18, Consolidation Order, *Cornell Univ. v. AT&T*, No. 2:25-cv-00054 (E.D. Tex. Feb. 18, 2025)
1072	D.I. 25, Docket Control Order, *Cornell Univ. v. AT&T*, No. 2:25-cv-00054 (E.D. Tex. Mar. 26, 2025)
1073	D.I. 11, Consolidation Order, *H2 Intellect v. The Home Depot*, No. 2:25-cv-00123 (E.D. Tex. Apr. 6, 2025)
1074	D.I. 46, Docket Control Order, *H2 Intellect v. The Home Depot*, No. 2:25-cv-00123 (E.D. Tex. May 30, 2025)
1075	D.I. 9, Consolidation Order, *HyperQuery v. Nemetschek Group*, No. 2:25-cv-00043 (E.D. Tex. Apr. 6, 2025)
1076	D.I. 17, Docket Control Order, *HyperQuery v. Nemetschek Group*, No. 2:25-cv-00043 (E.D. Tex. Jun. 2, 2025)
1077	D.I. 7, Consolidation Order, *Infogation v. TomTom*, No. 2:24-cv-01022 (E.D. Tex. Feb. 18, 2025)
1078	D.I. 23, Docket Control Order, *Infogation v. TomTom*, No. 2:24-cv-01022 (E.D. Tex. Mar. 27, 2025)
1079	Reserved
1080	Reserved

Exhibit	Description
1081	D.I. 16, Docket Control Order, *IOT Innovations v. Snap One*, No. 2:25-cv-00022 (E.D. Tex. Mar. 26, 2025)
1082	D.I. 12, Consolidation Order, *QR Switch v. Walmart*, No. 2:25-cv-00064 (E.D. Tex. Feb. 18, 2025)
1083	D.I. 22, Docket Control Order, *QR Switch v. Walmart*, No. 2:25-cv-00064 (E.D. Tex. Mar. 26, 2025)
1084	D.I. 21, Docket Control Order, *Valtrus Innovations v. Equinix*, No. 2:25-cv-00016 (E.D. Tex. Mar. 27, 2025)
1085	Chart of Consolidated and Individual Cases With Jury Selection Set For September 14, 2026 Before Judge Gilstrap
1086	Chart Listing Trials Held Before Judge Gilstrap Since September 29, 2024
1087	D.I. 39, Consolidation Order, *Netlist v. Samsung*, No. 2:22-cv-00293 (E.D. Tex. Oct. 21, 2022)
1088	D.I. 832, Minute entry showing start of jury selection, *Netlist v. Samsung*, No. 2:22-cv-00293-JRG-RSP (E.D. Tex. Nov. 12, 2024)
1089	D.I. 126, Minute entry showing start of jury selection, *Netlist v. Samsung*, No. 2:22-cv-00294-JRG-RSP (E.D. Tex. May 20, 2024)
1090	Chart of Cases Cited in Fractus Discretionary Denial Brief (Paper 9) at 7-11 with Median-Time-to-Trial Dates Added
1091	Fractus Litigation Outcomes (Docket Navigator) as of September 29, 2025
1092	Judge Gilstrap Profile Showing Number of Cases by Year as of September 29, 2025
1093	U.S. Patent No. 8,738,103
1094	Pages from file history for U.S. Patent Application Ser. No. 11/614,429

Exhibit	Description
1095	Reserved
1096	Reserved
1097	Reserved
1098	Declaration of David Ringle **[SUPPLEMENTAL EVIDENCE - NOT FILED]**
1099	IEEE Std. 802.11b-1999, Supplement to the IEEE Standard for Information Technology—Telecommunications and information exchange between systems—Local and metropolitan area networks—Specific requirements— Part 11: Wireless LAN Medium Access Control (MAC) and Physical Layer (PHY) specifications: Higher-Speed Physical Layer Extension in the 2.4 GHz Band (Jan. 20, 2000), *available at* https://ieeexplore.ieee.org/document/817038 **[SUPPLEMENTAL EVIDENCE - NOT FILED]**
1100	Declaration of Dara Del Rosario **[SUPPLEMENTAL EVIDENCE - NOT FILED]**
1101	D.I. 104, Claim Construction Order, *Fractus, S.A. v. Verizon Connect Inc. et al.*, No. 2:24-cv-01009 (E.D. Tex. Mar. 18, 2026)
1102	D.I. 114, Order, *Fractus, S.A. v. Verizon Connect Inc. et al.*, No. 2:24-cv-01009 (E.D. Tex. Apr. 6, 2026)
1103	Declaration of Daniel van der Weide, Ph.D. In Support of Petitioners' Reply to POR
1104	*Intentionally left blank*
1105	Steven E. Ellingson, *Electromagnetics II* (2025) (available at https://commons.libretexts.org/book/eng-19441 (last accessed April 25, 2026)), filed by Fractus as EX2009 in IPR2025-00929
1106	D.I. 75, Fractus's Opening Claim Construction Brief, *Fractus, S.A. v. Verizon Connect Inc. et al.*, No. 2:24-cv-01009 (E.D. Tex. Jan. 27, 2026)

Exhibit	Description
1107	Internet Archive copy of "Capitol Broadcasting Who We Are" web page captured on April 8, 2002
1108	Internet Archive copy of "Capitol Broadcasting Home" web page captured on March 31, 2002
1109	SEC Form 10-Q (Quarterly Report) for Lin TV Corp. (June 30, 2002)
1110	S. Derek Turner & Mark Cooper, *Out of The Picture 2007: Minority & Female TV Station Ownership in the United States* (Free Press 2007)
1111	Smith, "Dialogue demos 'total wireless' sub-notebook" (The Register, Jun. 2, 2004)
1112	IBM Hardware Announcement: New IBM ThinkPad T42 notebooks feature new fingerprint and Intel PRO/Wireless technologies (Jan. 11, 2005) *text version available at* http://www.ibm.com/docs/en/announcements/archive/ENUS105-006
1113	Internet Archive copy of the "Data Sheet" web page for the Symbol MC70 Enterprise Digital Assistant, captured on March 17, 2006
1114	*Intentionally left blank*
1115	Declaration of Dara del Rosario
1116	Amendment of Parts 2 and 73 of the Commission's AM Broadcast Rules concerning the use of the AM carrier, FCC 84-301 (Aug. 14, 1984)
1117	614-902 MHz (National Telecommunications and Information Administration Mar. 1, 2014) *available at* http://www.ntia.gov/files/ntia/publications/compendium/0614.00-0902.00_01MAR14.pdf
1118	Rodney Vaughan et al., "Channels, Propagation and Antennas for Mobile Communications," 50 *IET Electromagnetic Waves Series* 577-580 (2003)
1119	Settlement Agreement **[CONFIDENTIAL]**

I. STATEMENT OF PRECISE RELIEF REQUESTED

Pursuant to 35 U.S.C. § 317, and the Board's authorization provided on June 2, 2026, Petitioners Geotab Inc. and Geotab USA, Inc. ("Geotab" or "Petitioners") and Patent Owner Fractus S.A. ("Fractus" or "Patent Owner") (collectively, the "Parties") hereby provide notice that they have reached a settlement agreement and jointly request termination of the *inter partes* review of U.S. Patent No. 11,031,677 ("the '677 Patent"), Case No. IPR2025-01026, with the United States Patent and Trademark Office.

II. TERMINATION IS APPROPRIATE

The basis for this Joint Motion is the settlement of all disputes between the Parties relating to the '677 Patent.

On May 27, 2026, the Parties entered into a Settlement Agreement, under which the Parties agreed that Petitioners would move to terminate all IPR proceedings filed by them or their agents, i.e., this proceeding, IPR2025-01026.

An *inter partes* review shall be terminated with respect to any petitioner upon the joint request of the petitioner and the patent owner, unless the Office has decided the merits of the proceedings before the request for termination is filed. 37 U.S.C. § 317(a). Further, "no estoppel under section 315(e) shall attach to the petitioner, or to the real party in interest or privy of the petitioner." *See id.*

On June 2, 2026, the Board instituted Resmed's copycat petition in IPR2026-00191. As of the filing of this motion, however, Resmed's motion to join this proceeding (Paper 3, IPR2026-00191) remains pending. Since Resmed has not been joined to this IPR, there are presently no other petitioners remaining in this *inter partes* review. No Final Written Decision on the merits has been entered.

For at least these reasons, termination of the *inter partes* review is proper under 35 U.S.C. § 317(a).

III. RELATED PROCEEDINGS

A. District Court

The Parties have settled their dispute in *Fractus, S.A. v. Geotab Inc.*, No. 2:24-cv-01008 (E.D. Tex.).

Patent Owner's litigation against third-party and joinder-petitioner Resmed in *Fractus, S.A. v. Resmed Inc. and Resmed Corp*., 3:25-cv-02680 LL-JLB (S.D. Cal.), which alleges infringement of the '677 patent, remains ongoing.

There are no other active litigations alleging infringement of the '677 patent.

B. PTAB

On June 2, 2026, the Board instituted trial in *Resmed Corp. v. Fractus, S.A.*, IPR2026-00191. ResMed filed IPR2026-00191 based on a copycat petition (Paper 1) with a motion to join this IPR2025-01026 (Paper 3).

As of the filing date of this motion, there is no public record of a decision on ResMed's joinder motion in -00191.

IV. LEGAL STANDARD

35 U.S.C. § 317(a) provides that "[a]n *inter partes* review instituted under this chapter shall be terminated with respect to any petitioner upon the joint request of the petitioner and the patent owner, unless the Office has decided the merits of the proceeding before the request for termination is filed." The Trial Practice Guide also observes that "[t]here are strong public policy reasons to favor settlement between the parties to a proceeding" and that the Board "expects that a proceeding will terminate after the filing of a settlement agreement, unless the Board has already decided the merits of the proceeding." 77 Fed. Reg. 48,756, 48,768 (Aug. 14, 2012).

V. AGREEMENT IN WRITING SUBMITTED TO THE BOARD

Pursuant to 35 U.S.C. § 317(b), a true copy of the Parties' Settlement Agreement is being submitted as Exhibit 1119. The Settlement Agreement is in writing and constitutes the Parties' entire understanding and agreement. The Parties certify that there are no collateral agreements or understandings made in connection with, or in contemplation of, the termination of this *inter partes* review. Pursuant to 35 U.S.C. § 317(b), in a separate paper filed concurrently herewith, the Parties jointly request that the Settlement Agreement be treated as business confidential information and be kept separate from the underlying patent file.

VI. CONCLUSION

Termination of the proceeding is a just and fair resolution. The Parties agree that neither Geotab nor Fractus will be prejudiced by the termination of this proceeding. Finally, the Parties will benefit from preserving resources that would otherwise be expended if this motion is denied. For at least the foregoing reasons, the Parties respectfully request that the Board terminate *Inter Partes* Review IPR2025-01026.

Respectfully submitted,

Date: June 3, 2026 By: /Adam R. Wichman/

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Date: June 3, 2026 By: /Mark J. DeBoy/

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Counsel for Patent Owner,
Fractus, S.A.

CERTIFICATE OF SERVICE UNDER 37 C.F.R. § 42.6 (E)(4)

I certify that on June 3, 2026, a copy of the foregoing document, including any exhibits or appendices filed therewith, is being served via electronic mail, as previously consented to by Patent Owner, upon the following:

Mark J. DeBoy	mdeboy@esfip.com
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Date: June 3, 2026

/Dara Del Rosario/
Dara Del Rosario
Paralegal
WOLF, GREENFIELD & SACKS, P.C.