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. IPR2025-01027
Patent No. 11,349,200

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JOINT REQUEST THAT SETTLEMENT AGREEMENT BE TREATED AS BUSINESS CONFIDENTIAL INFORMATION AND KEPT SEPARATE UNDER 35 U.S.C. § 317(b) AND 37 C.F.R. § 42.74(c)

Petitioners Geotab Inc. and Geotab USA, Inc. ("Geotab" or "Petitioners") and Patent Owner Fractus S.A. ("Fractus" or "Patent Owner") (collectively, the "Parties") have settled their dispute with respect to U.S. Patent No. 11,349,200 ("the '200 Patent"), Case No. IPR2025-01027. The Settlement Agreement between the Parties fully resolves all disputes relating to the '200 Patent before the Patent Trial and Appeal Board. *See* Exhibit 1119. Pursuant to 37 C.F.R. § 42.74(b), any agreement or understanding between the parties made in connection with, or in contemplation of, the termination of a proceeding shall be in writing and a true copy shall be filed with the Board before the termination of the trial. Accordingly, the Parties have filed the Settlement Agreement herewith as Exhibit 1119.

Pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c), Petitioner and Patent Owner jointly request to file their Settlement Agreement, including the entirety of Exhibit 1119 to the Joint Motion to Terminate Proceeding, as business confidential information, and that it be kept separate from the file of the involved '200 Patent.

The terms require the Parties to treat the Settlement Agreement as confidential information and limit the Parties' ability to share the Settlement Agreement, or to disclose its contents with third parties. *See* Exhibit 1119. Moreover, the Settlement Agreement does not contain any information material to patentability. As such, the Parties respectfully request that the Board treat Exhibit

1119 as business confidential information pursuant to 35 U.S.C. § 317(b) and 37 C.F.R. § 42.74(c).

Respectfully submitted,

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

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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:

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Larry Shatzer	lshatzer@esfip.com
	Fractus_GeoTab_IPRs@esfip.com

Date: June 3, 2026

/Dara Del Rosario/
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