

Filed on behalf of: Resmed Corp.

Filed: June 1, 2026

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RESMED CORP.
Petitioner,

v.

FRACTUS, S.A.
Patent Owner.

Case No. IPR2026-00191
U.S. Patent No. 11,031,677

PETITIONER'S UPDATED MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8, Petitioner Resmed Corp. (“Petitioner”) respectfully provides the following response to the updates to related proceedings identified in Patent Owner’s Updated Mandatory Notices (“PO’s Updated Mandatory Notices”) (Paper 22, May 29, 2026).

As indicated in Petitioner’s initial Mandatory Notices, the Petition in this proceeding is a copycat of the petition in *Geotab Inc. v. Fractus, S.A.*, IPR2025-01026 (the “Geotab IPR”), both directed to the U.S. Patent No. 11,031,677 (“the ‘677 Patent”). *See* Pet., xv. Petitioner has requested joinder of this proceeding with the Geotab IPR. *See* Mot. Joinder, Paper 7. However, Patent Owner has indicated in its Updated Mandatory Notices that the parties to the Geotab IPR have settled their parallel district court case—*Fractus, S.A. v. Geotab Inc.*, No. 2:24-cv-01008 (E.D. Tex.)—and have jointly requested leave to file a motion to terminate the Geotab IPR (PO’s Updated Mandatory Notices, 2).

In the event the Geotab IPR is terminated prior to an institution and joinder decision in the instant proceeding, Petitioner hereby stipulates to maintaining the same briefing in this IPR on the same issues as Petitioner Geotab in the Geotab IPR. This stipulation ensures a seamless continuation of the original IPR rather than the

introduction of a duplicative “second” IPR on the ’677 Patent.¹ This approach ensures that the PTAB will remain an “effective *alternative* to district court patent litigation for resolve disputes over” the validity of the ’677 Patent by leveraging the resources that the PTAB has already invested without forcing Patent Owner to face “multiple petitions challenging the same patent.” *Magnolia Med. Techs., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17, at 2, 4 (May 14, 2026).

Date: June 1, 2026

Respectfully submitted,

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¹ The parallel district court litigation, *Fractus, S.A. v. Resmed Inc. and Resmed Corp.*, 3:25-cv-02680-LL-JLB (S.D. Cal.), remains pending.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of **PETITIONER'S
UPDATED MANDATORY NOTICES** is being served by electronic mail on
Patent Owner's counsel of record listed below, pursuant to its Mandatory Notices:

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