UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GEOTAB INC. AND GEOTAB USA, INC.,
Petitioners,

v.

FRACTUS, S.A.,
Patent Owner.

Case No. PGR2025-00056
Patent No. 12,095,149

DECLARATION IN SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF LARRY L. SHATZER (CORRECTED)

I, Larry L. Shatzer do hereby declare and say:

1. I am a citizen of the United States.

2. I am a member in good standing of the bars of Tennessee, Maryland, and the District of Columbia, and am admitted to practice before the following Federal Courts:

a. United States Supreme Court

b. United States Court of Appeals for the Federal Circuit;

c. United States Court of Appeals for the Fourth Circuit;

d. United States Court of Appeals for the D.C. Circuit;

e. United States District Court for the E.D. of Michigan;

f. United States District Court for the District of Maryland;

g. United States District Court for the E.D. Wisconsin;

3. I have not been suspended or disbarred from practice before any court or administrative body.

4. I have not been denied an application for admission to practice before any court or administrative body.

5. No sanctions or contempt citations have been imposed upon me by any court or administrative body.

6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in Part 42 of Title 37, Code of Federal Regulations ("C.F.R.").

7. I agree to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.* and disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

8. I have appeared before the United States Patent and Trademark Office in the last three (3) years in the following proceedings:

- IPR2024-00087;
- IPR2024-00088;
- IPR2024-00089; and
- PGR2025-00031.

9. In addition to this proceeding, I have applied to appear *pro hac vice* in the following proceedings:

- IPR2025-01027;
- IPR2025-01026;
- IPR2025-00929; and
- IPR2025-00928.

10. I am an experienced intellectual property litigation attorney and have served as lead counsel in numerous complex cases and patent infringement litigations. I have experience in various aspects of patent infringement matters including jury and bench trials, *Markman* hearings, and summary judgment hearings. I have argued several patent related cases before the U.S. Court of Appeals for the Federal Circuit. I am familiar with the subject matter at issue in this proceeding. I am familiar with the patents and technology at issue in Post Grant Review PGR2025-00056. I am also familiar with Patent Owner's legal strategies as they related to this patent. I also have extensive knowledge of the invalidity of the challenged claims.

11. I declare that all statements made of my own knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with the knowledge that willful false statements and the like are punishable by fine or imprisonment, or both under section 1001 of Title 18 of the United States Code.

Dated: September 23, 2025

/Larry L. Shatzer/
Larry L. Shatzer

CERTIFICATE OF SERVICE

The undersigned certifies that pursuant to 37 C.F.R. § 42.6(e), a copy of the foregoing **DECLARATION IN SUPPORT OF PATENT OWNER'S MOTION FOR *PRO HAC VICE* ADMISSION OF LARRY L. SHATZER (CORRECTED)** was served via email (as previously consented to by counsel) on September 23, 2025 to lead and backup counsel of record for Petitioners as follows:

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Dated: September 23, 2025

/Mark J. DeBoy/

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