

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

VALYANT AI, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 21-1698-MN
	)	
KEA CLOUD, INC.,	)	
	)	
Defendant.	)	
	)	
VALYANT AI, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 21-1700-MN
	)	
HI AUTO, INC., and E LA CARTE, INC.	)	
d/b/a PRESTO,	)	
	)	
Defendants.	)	
	)	

STIPULATION TO STAY ACTIONS

WHEREAS, plaintiff filed reissue Application No. 17/696,525 on March 16, 2022 in connection with U.S. Patent No. 10,592,706 (“the ’706 Patent”), the patent-in-suit in the above actions;

WHEREAS, the reissue requests the USPTO correct the ’706 Patent’s priority information to reflect it is a continuation-in-part of its parent application, U.S. Application No. 15/723,573;

WHEREAS, defendants filed a petition for *Inter Partes Review* (IPR2023-00450) on January 6, 2023 in connection with the ’706 Patent;

WHEREAS, the parties agreed to stay these actions at least until a decision on the institution of the IPR petition, which is expected by July 25, 2023;

WHEREAS, the parties discussed their agreement with the Court in a hearing on March 16, 2023 and the Court approved the proposal to stay these matters;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to the approval and Order of the Court, that these actions are stayed pending a decision on the institution of the IPR petition;

IT IS FURTHER ORDERED, that the parties shall provide a joint status report within two weeks of the issuance of a decision on the institution of the IPR petition, or the reissue of the '706 Patent, whichever occurs first.

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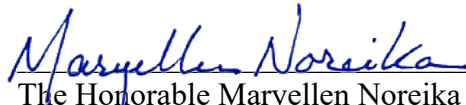
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E La Carte, Inc. d/b/a presto*

SO ORDERED this 23rd day of March 2023.



The Honorable Maryellen Noreika
United States District Judge