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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SANAS.AI INC., Plaintiff, v. KRISP TECHNOLOGIES, INC., Defendant.	CASE NO. 3:25-CV-05666-RS **JOINT CASE MANAGEMENT STATEMENT, JOINT RULE 26(f) REPORT, AND (PROPOSED) ORDER** Date: March 26, 2026 Time: 10:00 a.m. Dept: Courtroom 3 – 17th Floor (Via Videoconference) Judge Hon. Richard Seeborg

IPR2026-00272
Krisp Technologies, Inc. v. Sanas.AI Inc.
Patent Owner Exhibit 2009

The Parties to the above-entitled action jointly submit this JOINT CASE MANAGEMENT STATEMENT, JOINT RULE 26(f) REPORT, AND PROPOSED ORDER pursuant to the Court's Order, dated September 9, 2025 (Dkt. No. 29), as modified by the Court on January 6 (Dkt. No. 65) and March 5, 2026 (Dkt. No. 78), as well as the Standing Order for All Judges of the Northern District of California, revised November 30, 2023, Civil Local Rule 16-9, and Federal Rule of Civil Procedure 26(f).

1. JURISDICTION AND SERVICE

The Parties agree this Court has jurisdiction over the subject matter of Sanas' patent infringement claims (counts 1-4, 8-9), Krisp's patent infringement counterclaim (count 1), and Sanas' declaratory judgment claim (count 5), as well as Sanas' federal trade secret claim (count 6) and false advertising claim (count 10) pursuant to 28 U.S.C. §§ 1331, 1338(a), 2201, and/or 2202 based on the actual controversy between the Parties arising under the patent laws of the United States (35 U.S.C. § 100 *et seq.*), the Defend Trade Secrets Act (18 U.S.C. § 1836 *et seq.*), and Section 43 of the Lanham Act (15 U.S.C. § 1125), respectively. The Parties further agree this Court has supplemental jurisdiction over Sanas' declaratory judgment claim (count 5), state law trade secret claim (count 7), state law false advertising claims (counts 11-12) and Krisp's state law counterclaims (counts 2, 4) pursuant to 28 U.S.C. § 1367. The Parties do not challenge personal jurisdiction or venue, and all Parties have been served and have answered.

2. FACTS

Sanas' Claims

Sanas is the inventor of real-time accent translation software, which translates a speaker's accent such that a listener can fully understand what was said in real-time, while preserving the speaker's identity, emotion, intonation, and other personal nuances. Sanas has dedicated years and millions of dollars to the creation of this revolutionary product, developing and implementing proprietary algorithms and key design components, creating massive data sets, engaging in intensive market research, and identifying and solving essential design problems through numerous cycles of training and re-training its model.

Starting in September 2021, Krisp, a company focused on noise cancellation technology, actively pursued a partnership with Sanas. In November 2021, the Parties entered an NDA to enable Sanas to engage in the detailed discussions Krisp sought regarding the nuances and specifics of Sanas' proprietary product, research, and development. After Sanas divulged trade secrets to Krisp pursuant to the NDA during these discussions, and despite Krisp's expressed interest in a partnership with Sanas, Krisp abruptly ended the discussions in late 2022. Soon thereafter, Krisp announced the creation of its own accent translation software—one that attempted to imitate Sanas' market-leading offering by leveraging Sanas' intellectual property, including the trade secrets Sanas shared during the Parties' discussions and the inventions disclosed in Sanas' patents. Krisp also filed for and was issued two patents in its name that claimed inventions grounded in information Sanas provided to Krisp during the Parties' discussions. Krisp also engaged in a campaign of false advertising about Sanas' products through the publication of three blog posts, which are riddled with over 30 false or misleading statements, as well as misleading testing that Krisp purports to be "objective," but that is entirely subjective and relies on using cherry-picked samples and an outdated version of Sanas' software. The above facts form the basis of Sanas' patent infringement, co-inventorship/co-ownership, trade secret misappropriation, and false advertising claims under federal and state law.

Krisp's Claims

Krisp is a developer of real-time voice-processing technologies, including widely used noise cancellation and voice enhancement products that were commercially deployed years before the Parties' discussions. Krisp independently researched and developed its accent conversion technology using its own engineers, its own data, and techniques known in the field, without receiving – much less using – any confidential or proprietary information from Sanas.

In 2021, the Parties explored a potential commercial partnership and entered into a mutual NDA to facilitate high-level business and technical discussions. During those discussions, the Parties exchanged limited information regarding their respective product compatibilities and potential areas of collaboration. Sanas did not provide Krisp with any detailed technical

implementation information. Discovery will address what information was actually exchanged, in what form, and at what level of technical detail.

Krisp's accused accent conversion features were designed and implemented through Krisp's internal research and development process and are based on techniques and approaches that were publicly known or independently developed. Krisp's patents likewise reflect inventions conceived and reduced to practice solely by Krisp personnel. The Parties' technical discovery will address the development history of each side's systems and the state of the art at the relevant time.

Krisp also published blog posts comparing its products with Sanas' products. Krisp contends that those posts were accurate, based on thorough and fair testing and evaluation of the Parties' respective products, and constituted non-actionable opinion, fair comparison, and/or truthful statements. Discovery will address the testing performed, the basis for the challenged statements, and whether Sanas suffered any injury.

Krisp further alleges that Sanas engaged in anticompetitive conduct by offering its noise cancellation product for free or below cost on the condition that customers remove competing products, including Krisp's software. Krisp contends that this conduct was undertaken for the purpose of harming competition and caused injury to Krisp. Discovery will address Sanas' pricing, sales practices, and the effect of those practices on customers and competition.

These facts form the basis of Krisp's defenses to Sanas' claims and Krisp's counterclaims, and will be the subject of fact, third-party, and expert discovery.

3. LEGAL ISSUES

The current key legal issues in dispute pertaining to Sanas' claims against Krisp are:

- *Patent Infringement Claims.* The proper construction of the asserted claims of the Asserted Patents, whether Krisp infringed one or more claims of the Sanas Asserted Patents, whether the Sanas Asserted Patents are valid and comport with the requirements of 35 U.S.C. §§ 101, 102, and 103, and Sanas' entitlement to the relief sought (*see infra* Section 11);
- *Trade Secret Claims.* Whether the information Sanas shared with Krisp constitutes one or more trade secrets, including whether Sanas took reasonable efforts to maintain the

information's secrecy and whether the information has independent economic value, whether Krisp misappropriated the trade secrets, and Sanas' entitlement to the relief sought (*see infra id.*);

- *Co-Inventorship and Co-Ownership Claim.* Whether Sanas' employees jointly contributed to Krisp's accent conversion patent and Sanas' entitlement to the relief sought (*see infra id.*);
- *False Advertising Claims.* Whether Krisp's blog posts contain false or misleading statements, whether Sanas was injured as a result, and Sanas' entitlement to the relief sought (*see infra id.*).

The current key legal issues in dispute pertaining to Krisp's counterclaims against Sanas are:

- *Patent Infringement Claim.* The proper construction of the asserted claims of the Krisp Asserted Patent, whether Sanas infringed one or more claims of the Krisp Asserted Patent, whether the Krisp Asserted Patent is valid and comports with the requirements of 35 U.S.C. §§ 101, 102, 103 and 112, and Krisp's entitlement to the relief sought (*see infra id.*);
- *Giveaway Claim.* Whether Sanas gave away noise cancellation technology for the purpose of injuring or destroying competition and Krisp's entitlement to the relief sought (*see infra id.*).
- *Unfair Competition Claim.* Whether Sanas' giveaway and alleged below-cost sales and other practices constitute unfair competition under Cal. Bus. & Prof. Code § 17200 *et. seq.* and Krisp's entitlement to the relief sought (*see infra id.* 11).

4. <u>MOTIONS</u>

The Parties previously filed motions to dismiss, with Sanas seeking to dismiss Krisp's counterclaims for violations of California's UPA and UCL (*see* Dkt. No. 38) and Krisp seeking to dismiss Sanas' trade secret misappropriation, co-inventorship and co-ownership, and false advertising claims (*see* Dkt. No. 39). On December 1, 2025, the Court denied Krisp's motion to dismiss and granted in part Sanas' motion to dismiss, dismissing Krisp's counterclaim for violation of California's UPA, Cal. Bus. & Prof. Code § 17044 (count 3) (*see* Dkt. No. 58).

On November 19, 2025, Krisp filed another motion to dismiss (Dkt. No. 49), seeking to dismiss five of Sanas' patent infringement claims (Counts 1-2, 4, 8-9), which the Court denied as an improper successive motion to dismiss (Dkt. No. 63). Thereafter, on January 5, 2026, Krisp filed a motion for judgement on the pleadings as to Sanas' same patent infringement claims, which was denied on February 23, 2026 (Dkt. No. 72).

On March 3, 2026, Sanas filed a motion to compel Krisp's discovery responses to certain of Sanas' Requests for Production ("RFPs") (Dkt. No. 73) and Krisp filed a motion to compel a more particular § 2019.210 trade secret disclosure and for a protective order (Dkt. No. 75). The Court subsequently assigned discovery to a randomly assigned magistrate judge. The assigned judge, Magistrate Judge Kandis A. Westmore, terminated both motions and ordered the Parties to meet and confer to resolve the dispute and file a joint discovery letter if necessary (Dkt. No. 82). The Parties met and conferred by video on March 13, 2026, but did not resolve the dispute; consequently, the Parties expect to file a joint discovery letter on March 20, 2026, which will be resolved by the Magistrate Judge.

No other substantive motions have been filed to date. Sanas anticipates filing motions for summary judgment on Krisp's surviving state law counterclaims (counts 2, 4) and patent infringement counterclaim (count 1). Krisp anticipates filing a motion for summary judgment on Sanas' patent infringement claims (counts 1-4, 8-9), trade secret misappropriation claim (counts 6-7), co-inventorship and co-ownership claim (count 5), unfair competition claim (count 11), and false advertising claim (12).

5. <u>AMENDMENT OF PLEADINGS</u>

The deadline to amend pleadings is included in the Proposed Schedules (*see* Exhibit A).

6. <u>EVIDENCE PRESERVATION</u>

The Parties certify that they have reviewed the Guidelines Relating to the Discovery of Electronically Stored Information ("ESI Guidelines") and confirm that on November 18, 2025, they met and conferred pursuant to Fed. R. Civ. P. 26(f) regarding reasonable and proportionate steps taken to preserve evidence relevant to the issues reasonably evident in this action. The Parties are negotiating an ESI order.

7. DISCLOSURES

The Parties agreed to exchange Initial Disclosures pursuant to Fed. R. Civ. P. 26(a) on December 4, 2025. Sanas served its initial disclosures on December 4 and Krisp served its initial disclosures on December 5.

8. DISCOVERY

A. *Discovery Taken to Date and Anticipated Discovery*

The Parties have been engaged in discovery since November 2025, but have reached an impasse with regard to Krisp's contention that it has no obligation to respond to dozens of Sanas' discovery requests until Sanas provides a more particular trade secret disclosure under § 2019.210. The Parties expect to file a joint letter to Magistrate Judge Westmore to resolve the dispute. Sanas anticipates filing another joint discovery letter regarding Krisp's other deficient discovery responses to date. Krisp states that it is continuing to supplement its responses and states that it has not refused to supplement any discovery responses beyond the 2019.210 dispute identified above. Krisp anticipates filing an additional joint discovery letter regarding Sanas' alleged refusal to produce technical discovery to date based on the parties' dispute over whether Sanas has sufficiently identified its products that include Noise Cancellation technology. Sanas states that it has not refused to produce technical discovery and has fully responded to Krisp's interrogatory seeking product identification.

The Parties summarize discovery taken to date as follows. Sanas served its First Set of RFPs and Requests for Admission on November 19, 2025, to which Krisp timely served its responses and objections. Sanas served its First Set of Interrogatories on December 2, 2025, to which Krisp timely served responses and objections. Sanas served its Second Set of RFPs on March 6, and Krisp's responses and objections are due on April 6, 2026.

Krisp served its First Set of RFPs on December 17, and its First and Second Sets of Interrogatories on December 19 and 30, 2025, to which Sanas timely served responses and objections. As part of its responses, Sanas served its Trade Secret Disclosure Statement. Krisp served its Second Set of RFPs on March 13, and Sanas' responses and objections are due on April 13, 2026.

To date, Krisp has made six document productions, on January 23, January 27, February 25, March 2, March 13, and March 19, 2026, producing over 600 documents and things and Sanas made one document production on February 20, 2026, producing over 700 documents. The Parties will continue to produce responsive documents on a rolling basis.

The Parties have met and conferred with regard to a discovery plan, as detailed below.

B. *Discovery Plan Pursuant to Federal Rule of Procedure 26(f)*

1. Disclosures (Fed. R. Civ. P. 26(f)(3)(A))

The Parties exchanged initial disclosures on December 4 (Sanas) and December 5, 2025 (Krisp) and do not anticipate needing changes to the timing, form, or requirement for disclosures under Rule 26(a).

2. Subjects, Schedule, and Phasing of Discovery (Fed. R. Civ. P. 26(f)(3)(B))

The Parties' Proposed Schedules (*see* Exhibit A) include discovery deadlines. The Parties contend that discovery is needed on at least the below-listed subjects and reserve the right to conduct discovery on all claims and defenses asserted in this action, using any discovery method allowed by the Federal Rules of Civil Procedure.

Subjects of Sanas' discovery requests:

- Krisp-Sanas potential partnership, including but not limited to:
  - Discussions between the Parties (leading up to, during, and after termination);
  - Materials prepared in furtherance of the potential partnership;
  - Documents and materials shared between the Parties;
  - Krisp's internal discussions about and evaluations of Sanas, its technology, and/or its information exchanged;
  - Krisp's decision to terminate discussions.
- Krisp's use of information shared by Sanas;
- Krisp's accent translation technology (Krisp's '609 and '979 patents), including related to Krisp's internal research and development process;
- Krisp's voice enhancement and noise reduction technology (Krisp's '941 patent), including related to its internal research and development process;

- Krisp's blog posts comparing its products and Sanas' products,[1] including:
  - How Krisp conducted its comparisons described in the blog posts;
  - How Krisp acquired Sanas-enhanced audio samples or Sanas' software;
  - Krisp's research into its claims prior to posting the blogs at issue;
  - Traffic history to the blogs.

Subjects of Krisp's discovery requests

- Sanas' noise cancellation technology, including but not limited to:
  - Sanas' knowledge of Krisp's patent and noise cancellation technology;
  - Sanas' internal communications and technical documentation;
  - Sanas' marketing and pricing strategy and motivations for below cost pricing;
  - Sanas' sales of noise cancellation and bundled/complementary products;
  - Compatibility and/or barriers of Sanas' software with competing software.
- The Krisp-Sanas potential partnership, including but not limited to:
  - Sanas' execution of and compliance with the NDA;
  - Sanas' efforts to protect any alleged trade secrets disclosed to Krisp;
  - Sanas' internal discussions about and evaluations of Krisp, its technology, and/or its information exchanged;
  - Information disclosed by Sanas to Krisp.
- Sanas' accent translation, voice enhancement and noise reduction technologies, including the Asserted Patents and other Sanas patents, including related to Sanas' internal research and development process;
- Sanas' blog posts relating to its own technology as well as comparing or discussing Krisp's technology, including:
  - Sanas' public statements regarding Sanas' technology;

[1] *"Krisp vs. Sanas: Accent Conversion Comparison,"* April 21, 2025, https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/; *"Krisp vs. Sanas: Noise Cancellation Comparison,"* August 30, 2024, https://krisp.ai/blog/krisp-vs-sanas-noise-cancellation-comparison/; and *"Krisp vs. Sanas – Inbound Noise Cancellation Comparison,"* July 22, 2025, https://krisp.ai/blog/krisp-vs-sanas-inbound-noise-cancellation-comparison/.

- Sanas' public statements regarding Krisp or Krisp's technology;
- How Sanas conducted any technology comparisons described in its blog posts;
- How Sanas acquired Krisp -enhanced audio samples or Krisp's software;
- Sanas' research into its claims prior to posting the blogs at issue.

- Sanas' communications, including to Krisp customers or potential customers, in which Sanas made statements or representations about the litigation or about Krisp;
- Sanas' rationale for bringing litigation against Krisp.

3. ESI (Fed. R. Civ. Proc. 26(f)(3)(C))

The Parties are negotiating a stipulated ESI order.

4. Issues About Claims of Privilege (Fed. R. Civ. Proc. 26(f)(3)(D))

The Parties entered a Protective Order (Dkt. No. 68), ordered by the Court on February 13, 2026 (Dkt. No. 70), which addresses inadvertent disclosures. The Parties agree that an order under Fed Rule Evid 502(d) is not necessary at this time.

5. Limitations on or Modifications of the Discovery Rules (Fed. R. Civ. P. 26(f)(3)(E))

The Parties do not currently propose any changes to the limitations on discovery provided by the Fed. R. Civ. P. or Local Rules but reserve their rights to seek future modifications.

6. Other Orders (Fed. R. Civ. Proc. 26(f)(3)(F)) – Protective Order

The Parties entered a Protective Order (Dkt. No. 68), which was ordered by the Court on February 13, 2026 (Dkt. No. 70), to protect personal, confidential, trade secret and/or proprietary information which is likely to be exchanged during discovery in this matter.

7. Identified Discovery Disputes

The Parties are at an impasse with respect to Sanas' purported obligation to disclose its trade secrets with additional particularity and Krisp's obligation to participate in trade-secret discovery related to "the technical operation of Krisp's system" absent a more particular trade secret disclosure under California Code of Civil Procedure § 2019.210. The Parties will file a joint letter detailing this dispute to Magistrate Judge Kandis A. Westmore on March 20, 2026. Sanas'

position is that Krisp should be ordered to respond to Sanas' RFPs because (i) Krisp failed to timely raise the objection and thus waived it; (ii) the Ninth Circuit ruled in *Quintara Biosciences, Inc. v. Ruifeng Biztech, Inc.* 149 F. 4th 1081 (2025), that section 2019.210 does not apply to federal Defend Trade Secret Act claims like the one brought by Sanas here; (iii) Sanas provided an identification of its trade secrets in compliance with section 2019.210; and (iv) the disputed Sanas RFPs concern Sanas' patent infringement claims and therefore section 2019.210 cannot be used to block the discovery. Krisp's position is that (i) 30 days after receiving Sanas' RFPs, Krisp provided its objection in a letter detailing the requirements of Section 2019.10 and stating that "[b]ecause §2019.210 operates as a prerequisite to trade secret-related discovery, we cannot proceed with such discovery until the required disclosure has been provided," (ii) that *Quintara Biosciences* had no CUTSA claim and therefore has no impact on cases that do include a CUTSA claim, (iii) that Sanas' trade secrets do not comply with the "reasonable particularity" requirement of Section 2019.210, and (iv) that Section 2019.210 applies to the entire lawsuit and is not "claim specific" such that overlapping patent discovery can proceed without complying first with Section 2019.210. Sanas must provide a sufficient trade secret disclosure pursuant to Section 2019.210 and Krisp's corresponding interrogatory to Sanas, and Krisp needs protection from trade secret-related discovery until Sanas' service of a compliant trade secret disclosure in accordance with Section 2019.210.

In addition to the above dispute, the Parties are conferring about Sanas' contention that Krisp's other discovery responses are deficient and Krisp's contention that Sanas' other discovery responses are deficient. On February 25, 2026, Sanas sent a letter to Krisp detailing: (a) Krisp's deficient document production despite promising to produce relevant discovery in a timely manner; and (b) Krisp's failure to provide complete and truthful interrogatory responses. Likewise, Krisp sent a letter to Sanas on February 26, 2026, detailing: (a) Sanas' deficient document production and (b) Sanas' failure to provide complete and truthful interrogatory responses. The Parties are continuing to confer regarding Krisp's (disputed) claim that Sanas is refusing to provide technical discovery relating to Krisp's patent claims. The Parties will continue working together on these issues in an effort to avoid seeking the Court's assistance.

9. CLASS ACTIONS

Not applicable.

10. RELATED CASES

On March 18, 2026, Krisp filed petitions for *Inter Partes* Review and Post Grant Review directed to three of the patents asserted by Sanas in this case, the '745, '457, and '561 patents, in the following IPR2026-00274, IPR2026-00275, and PGR2026-00032.

11. RELIEF

Sanas seeks relief as follows: (i) for patent infringement: a judgment that Krisp has willfully infringed the '550, '496, '745, '457, '561, and '756 patents; monetary relief in an amount to be proved at trial; injunctive relief; and attorneys' fees and costs; (ii) for declaratory judgment: declaratory relief; (iii) for trade secret misappropriation: injunctive relief; monetary relief in an amount to be proved at trial; an order for accounting; and disgorgement; and (iv) for false advertising: injunctive relief; an order for Krisp to issue a retracting and corrective statement; factual determinations; and monetary relief in an amount to be proved at trial. Krisp denies that Sanas is entitled to the foregoing relief.

Krisp seeks relief as follows: (i) for patent infringement: a judgment that Sanas willfully infringed the '941 patent; injunctive relief; monetary relief in an amount to be proved at trial; and recovery of its attorneys' fees and costs; and (ii) for state law claims: a determination that Sanas engaged in unlawful and/or unfair business practices; for injunctive relief; and monetary relief in an amount to be proved at trial. Sanas denies that Krisp is entitled to the foregoing relief.

12. SETTLEMENT AND ADR

The Parties have complied with Civ. L.R. 16-8(b) and ADR L.R. 3.5. The Parties agree to a settlement conference with a magistrate judge and agree it should be held after the order is issued following the Claim Construction Hearing.

13. OTHER REFERENCES

This case is not suitable for binding arbitration, a special master, or the Judicial Panel on Multidistrict Litigation.

14. NARROWING OF ISSUES

The Parties do not believe any issues can be narrowed by agreement at this time. The Parties do not request to bifurcate any issue, claims, or defenses at this time, but reserve the right to make such a request as additional facts are learned through discovery. The Parties jointly identify the following issues that presently appear most consequential to the resolution of the case:

Whether Krisp's accent conversion products infringe Sanas' accent translation patents and whether Sanas' products infringe Krisp's noise cancellation patents. This can be expedited through early disclosures of the development and operation of Krisp's accent conversion software and Sanas' noise cancellation software.

Whether Krisp misappropriated Sanas' asserted trade secrets. This issue can be expedited through early disclosure of information regarding Sanas' alleged trade secrets, regarding Sanas' communications to Krisp, and regarding Krisp's development of its accent translation software.

Whether Krisp's blog posts contain false statements. This issue can be expedited through early disclosure of information about the basis for the statements and the process for Krisp's comparison testing.

Whether Sanas engaged in unlawful or unfair business practices. This issue can be expedited through early disclosure regarding Sanas' noise cancellation product and its pricing and marketing strategy, as well as technological restrictions conditioning the use of Sanas' technology on not using Krisp's technology.

15. SCHEDULING

The Parties agree to schedule dates up to the date for the close of discovery. The Parties have been unable to reach agreement on a schedule governing close of discovery and beyond, with Krisp proposing deadlines approximately four months later than Sanas' proposal, and submit as Exhibit A their respective proposals for the key deadlines. The Parties' explanations for their

respective proposals are set forth below. The Parties' proposals are presented without prejudice to requesting alternative pre-trial deadlines in the event the Court selects a different date for trial.

Sanas' Position:

Sanas proposes a schedule with a trial date in July 2027—approximately 2 years after commencement of this action. Sanas' proposed schedule is in line with Your Honor's schedules for similar cases and is commensurate with the scope and complexity of this case. This timeline accounts for the claims alleged by both Parties, including patent infringement, patent co-ownership and co-inventorship, trade secret misappropriation, and other state law claims, as well as necessary discovery pertaining to same.

Discovery has been ongoing since November 2025, is significantly advanced (as detailed herein), and can be reasonably concluded by January 2027, over one year later (as opposed to Krisp's suggested date of April 22, 2027, nearly 1.5 years later). This timeline provides more than ample time to enable the Parties to take necessary discovery and develop their legal theories, while also resolving the case within a reasonable timeline. Indeed, Sanas served discovery on the first date permitted under the federal rules and the only reason discovery is not more advanced is Krisp's meritless refusal to provide any technical information about the accused products, as detailed above.

Krisp's Position:

Krisp proposes a schedule commensurate with the scope and structure of this case. This is not a simple patent action. The case currently involves seven asserted patents, two additional patents that are the subject of Sanas' inventorship allegations, a trade secret misappropriation claim, false advertising claims, and related state-law counterclaims proceeding in both directions. These claims present distinct technical subject matters, separate development histories, and different categories of damages, and will require multiple streams of fact and expert discovery.

Krisp's proposed trial date of November 2027 is consistent with the time to trial commonly set in this District for complex, multi-patent cases. Although it is approximately four months later than the July 2027 date proposed by Sanas, that difference is modest in the context of a case involving this number of patents and legal theories. In addition, the Rule 26(f) conference

occurred approximately three and a half months after the complaint was filed, and Sanas did not make its first document production until the last week of February 2026. As a practical matter, meaningful fact discovery therefore began at that time. Measured from the commencement of discovery, Krisp's proposed schedule reflects a standard and efficient timeline, while the earlier trial date proposed by Sanas would significantly compress the schedule typically associated with such cases.

In addition, Sanas has sent detailed communications to a number of Krisp's customers detailing its allegations in this action against the backdrop of a discovery preservation notice. As a result, the schedule must also anticipate significant third-party discovery, including document subpoenas and depositions. That discovery will require time for collection, production, and scheduling that is outside the Parties' direct control. Incorporating that time into the case schedule at the outset will reduce the likelihood of later modifications.

Furthermore, Defendant has filed petitions for *Inter Partes* review and Post Grant Review challenging three of the asserted Sanas patents. While no stay is currently sought, the pendency of those proceedings further supports a schedule that allows for orderly coordination between this case and the PTAB proceedings, and avoids unnecessary inefficiency or duplication.

For these reasons, Krisp's proposed schedule reflects a reasonable and case-specific approach that will allow the Parties to complete discovery and present the issues in a coordinated and efficient manner.

16. <u>TRIAL</u>

The Parties demand a trial by jury, which they jointly estimate will take between eight to ten full court days.

17. <u>DISCLOSURE OF NON-PARTY INTERESTED ENTITIES OR PERSONS</u>

Sanas filed a "Certification of Conflicts and Interested Entities or Persons" (Dkt. No. 4) and Krisp filed a "Corporate Disclosure Statement and Certification of Conflicts and Interested Entities or Persons" (Dkt. No. 27). The Parties identify the following persons, firms, partnerships, corporations or other entities known to have either (i) a financial interest in the subject matter in the controversy or in a party to the proceeding; or (ii) any other kind of interest that could be

substantially affected by the outcome of the proceeding:

- Sanas: Sanas.AI, Inc.
- Krisp: Krisp Technologies, Inc.

18. PROFESSIONAL CONDUCT

The attorneys for the Parties certify that they have reviewed the Guidelines for Professional Conduct for the Northern District of California.

19. OTHER MATTERS

There are no other matters to be addressed at this time.

20. PATENT-RELATED ISSUES PURSUANT TO PATENT LOCAL RULE 2-1(B)

Pursuant to Patent L.R. 2-1(b), the Parties have met and conferred regarding the following additional matters:

A. *Agreed Proposed Schedules (Patent L.R. 2-1(b)(1)-(2))*

The Parties' Proposed Schedules, attached as Exhibit A, include patent-specific deadlines.

B. *Format of the Claim Construction Hearing (Patent L.R. 2-1(b)(3))*

The Parties agree that the format and presentation of argument at the hearing should be according to the Court's typical approach. The Parties anticipate the hearing will include technology tutorials by each Party. The Parties do not currently anticipate presenting live testimony but reserve the right to do so. The Parties anticipate requesting 2-3 hours for the hearing.

C. *Educate the Court on the Technology at Issue (Patent L.R. 2-1(b)(4))*

The Parties agree that technology tutorials by each Party will be helpful in educating the Court on the technology at issue.

D. *Non-Binding, Good-Faith Estimate of Damages Range (Patent L.R. 2-1(b)(5))*

Sanas' Statement

Sanas seeks monetary damages in an amount to be proven at trial, including lost profits, but in no event less than a reasonable royalty; an ongoing royalty in an amount to be determined from continued infringement after the date of judgment; a permanent injunction prohibiting Krisp from further infringement of Sanas' patents; a finding that this case is exceptional under 35 U.S.C.

§ 285 and that Sanas is entitled to attorneys' fees and other recoverable expenses; actual loss and/or unjust enrichment, or in the alternative a reasonable royalty, as well as injunctive relief, for trade secret misappropriation, along with enhanced damages as a result of Krisp's willful infringement; actual damages and/or disgorgement, restitution, declaratory and injunctive relief for false advertising as well as treble damages for willful or egregious conduct; a declaration that one or more Sanas personnel made inventive contributions to the Krisp accent conversion patents and that Sanas is a co-owner of such patents; an award of prejudgment and post-judgment interest, costs, and other expenses; and such other and further relief as the Court may deem just and proper.

Pursuant to Patent L.R. 2-1(b)(5), Sanas states that it has insufficient information at this time to provide an estimate of the damages range expected for the case. To generate an estimate, Sanas requires information from Krisp about its revenue attributable to the products at issue, as well as identification of Krisp customers taken from Sanas, which it has not received to date. Sanas expects to be able to provide a damages estimate after such information is disclosed.

Krisp's Statement

Krisp seeks monetary damages in an amount to be proven at trial, including lost profits, but in no event less than a reasonable royalty; an ongoing royalty in an amount to be determined from continued infringement after the date of judgment; a permanent injunction prohibiting Sanas from further infringement of Krisp's patents; a finding that this case is exceptional under 35 U.S.C. § 285 and that Krisp is entitled to attorneys' fees and other recoverable expenses; actual damages and/or disgorgement, restitution, declaratory and injunctive relief for unfair competition and below-cost sales and conditioning the use of Sanas' technology on not using Krisp's technology; an award of prejudgment and post-judgment interest, costs, and other expenses; and such other and further relief as the Court may deem just and proper.

Pursuant to Patent L.R. 2-1(b)(5), Krisp states that it has insufficient information at this time to provide an estimate of the damages range expected for the case. To generate an estimate, Krisp requires information from Sanas about its revenue attributable to the products at issue, as well as identification of Sanas customers taken from Krisp, which it has not received to date. Krisp expects to be able to provide a damages estimate after such information is disclosed.

Dated: March 19, 2026

/s/ Daniel Zaheer

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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from each of the above signatories.

/s/ Daniel Zaheer
Daniel Zaheer

CASE MANAGEMENT ORDER

The above JOINT CASE MANAGEMENT STATEMENT is approved as the Case Management Order for this case and all Parties shall comply with its provisions.

IT IS SO ORDERED.

Dated: , 2026

_____
Hon. Richard Seeborg
Chief United States District Court Judge

EXHIBIT A

Exhibit A
Proposed Schedule

Event	Sanas' Proposed Deadline	Krisp's Proposed Deadline
Initial Case Management Conference Statement	March 19, 2026	March 19, 2026
Initial Case Management Conference	March 26, 2026, 10:00 a.m.	March 26, 2026, 10:00 a.m.
Serve infringement contentions and accompanying production (Patent L.R. 3-1, 3-2)	April 9, 2026	April 9, 2026
Serve invalidity contentions and accompanying production (Patent L.R. 3-3, 3-4)	May 26, 2026	May 26, 2026
Exchange proposed claim terms for construction (Patent L.R. 4-1)	June 9, 2026	June 9, 2026
Exchange of preliminary claim construction and extrinsic evidence (Patent L.R. 4-2)	June 30, 2026	June 30, 2026
Damages contentions (Patent L.R. 3-8)	July 15, 2026	July 15, 2026
Joint claim construction and prehearing statement and expert reports (Patent L.R. 4-3)	July 27, 2026	July 27, 2026
Responsive damages contentions (Patent L.R. 3-9)	August 14, 2026	August 14, 2026
Claim construction discovery cutoff (Patent L.R. 4-4)	August 26, 2026	August 26, 2026
Opening claim construction brief (Patent L.R. 4-5)	September 10, 2026	September 10, 2026
Responsive claim construction brief (Patent L.R. 4-5)	September 24, 2026	September 24, 2026
Reply claim construction brief (Patent L.R. 4-5)	October 1, 2026	October 1, 2026
Claim Construction Hearing (Patent L.R. 4-6)	October 15, 2026	October 15, 2026
Last day to amend pleadings without leave of court	October 30, 2026	October 30, 2026
Proposed Date for Designation of Experts	November 6, 2026	November 6, 2026
Close of fact discovery	January 22, 2027	April 22, 2027

Event	Sanas' Proposed Deadline	Krisp's Proposed Deadline
Deadline to file discovery motions relating to fact discovery	January 29, 2027	May 29, 2027
Opening expert reports	February 12, 2027	June 12, 2027
Rebuttal expert reports	March 5, 2027	July 6, 2027
Close of expert discovery	March 26, 2027	July 30, 2027
Opening summary judgment/ Daubert Briefs	April 8, 2027	August 17, 2027
Responsive summary judgment/ Daubert Briefs	April 29, 2027	September 7, 2027
Reply summary judgment/ Daubert Briefs	May 6, 2027	September 21, 2027
Hearing on summary judgment/ Daubert Motions	May 20, 2027	September 7, 2027
Pretrial Conference	June 30, 2027	October 28, 2027
Jury Trial (8 days)	July 12, 2027	November 15, 2027