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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

SANAS.AI INC., Plaintiff, vs. KRISP TECHNOLOGIES, INC., Defendant.	Case No.: 3:25-cv-05666-RS **DEFENDANT'S ANSWER TO PLAINTIFF'S FIRST AMENDED COMPLAINT FOR DECLARATORY JUDGMENT, PATENT INFRINGEMENT, TRADE SECRET MISAPPROPRIATION, AND FALSE ADVERTISING** **DEMAND FOR JURY TRIAL**

KRISP'S ANSWER TO FIRST AMENDED COMPLAINT

Defendant Krisp Technologies, Inc. ("Krisp"), by and through its attorneys, respectfully submits its Answer to Sanas.AI Inc.'s ("Plaintiff" or "Sanas") First Amended Complaint (Dkt. 35). Except as expressly admitted, Krisp denies each and every allegation and characterization in Sanas' First Amended Complaint. Krisp's specific responses to the numbered allegations, which correspond to the numbered paragraphs of the Amended Complaint, are set forth below.

INTRODUCTION[1]

1. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1 and, therefore, denies the same.

2. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2 and, therefore, denies the same.

3. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 3 and, therefore, denies the same.

4. Krisp admits that the URL https://www.washingtonpost.com/world/2025/06/21/india-ai-bpo-call-centers/ contains the following quote "What we are seeing is that it is adding value to individual people." Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 4 and, therefore, denies the same.

5. Krisp admits that the URL https://www.washingtonpost.com/world/2025/06/21/india-ai-bpo-call-centers/ contains the following quote "But companies say it's delivering results: happier customers, satisfied agents,

[1] For clarity and ease of reference, the section headers recited in Sanas' First Amended Complaint are used. Such use is for convenience and does not indicate that Defendants admit or agree with any text or implication of the used headers.

faster calls." Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 5 and, therefore, denies the same.

KRISP'S COPYCAT TECHNOLOGY

6. Krisp denies the allegations in Paragraph 6.

7. Krisp admits that the URL https://krisp.ai/blog/krisp-ai-accent-conversion-v3/ contains the following quotes: "Krisp AI Accent Conversion v3," "Mar 25, 2025," and "This milestone validates our unique approach to accent transformation." Krisp denies the remaining allegations in Paragraph 7.

8. Krisp denies the allegations in Paragraph 8.

9. Krisp denies the allegations in Paragraph 9.

THE PARTIES

10. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 10 and, therefore, denies the same.

11. Krisp admits it is a corporation organized under the laws of the State of Delaware, with a principal place of business at 2150 Shattuck Ave., Suite 1300, Berkley, CA 94704.

JURISDICTION AND VENUE

12. Paragraph 12 alleges legal conclusions to which no response is required. To the extent a response is required, Krisp admits that the First Amended Complaint purports to be a patent infringement action arising under the Patent Laws of the United States. Krisp admits that this Court has subject matter jurisdiction over claims of patent infringement (35 U.S.C. § 271 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).. Krisp specifically denies any alleged infringement, misappropriation,

incorrect inventorship, false/misleading statements, and any other alleged liability proffered in Sanas' First Amended Complaint.

13. Krisp does not dispute that this Court has supplemental jurisdiction over a meritorious declaratory judgment claim or that this Court has supplemental jurisdiction over meritorious state law claims alleged. Krisp specifically denies any alleged infringement, misappropriation, incorrect inventorship, false/misleading statements, and any other alleged liability from Sanas' First Amended Complaint.

14. Krisp does not contest that this Court has personal jurisdiction over it for the purposes of this action. Krisp denies that it has committed any acts of infringement, misappropriation, incorrect inventorship, false/misleading statements, and any other alleged liability proffered in Sanas' First Amended Complaint in this District or anywhere else. Krisp denies the remaining allegations in Paragraph 14.

FACTUAL BACKGROUND

Sanas' Origins

15. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 15 and, therefore, denies the same.

16. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 16 and, therefore, denies the same.

17. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 17 and, therefore, denies the same.

18. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 18 and, therefore, denies the same.

19. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 19 and, therefore, denies the same.

20. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 20 and, therefore, denies the same.

21. Krisp denies that Sanas' accent translation technology was novel. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 21 and, therefore, denies the same.

22. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 and, therefore, denies the same.

23. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 23 and, therefore, denies the same.

24. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 24 and, therefore, denies the same.

25. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 25 and, therefore, denies the same.

26. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 and, therefore, denies the same.

27. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 27, and, therefore, denies the same.

28. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 28, and, therefore, denies the same.

29. Krisp admits that Provisional Patent Application No. 63/185,345 contains the title "Real-Time Accent Conversion Model" and states that it was filed on May 6, 2021. Krisp lacks

knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 29 and, therefore, denies the same.

30. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 30, and, therefore, denies the same.

Krisp Seeks Sanas' Accent Translation Technology

31. Krisp admits that on September 7, 2021, Robert Schoenfield sent a LinkedIn message to Shawn Zhang. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 31 and, therefore, denies the same.

32. Krisp admits that it had no direct contact with Sanas prior to September 7, 2021. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 32 and, therefore, denies the same.

33. Krisp admits that it was originally founded as 2Hz, has operations based in Armenia, and has noise cancellation functionality. Krisp admits that the URL https://developer.nvidia.com/blog/nvidia-real-time-noise-suppression-deep-learning/ contains the following quote "Two years ago, we sat down and decided to build a technology which will completely mute the background noise in human-to-human communications, making it more pleasant and intelligible." Krisp denies the remaining allegations in Paragraph 33.

34. Krisp admits that Mr. Zhang did not respond to Mr. Schoenfield's September 7, 2021 LinkedIn message and admits that Mr. Schoenfield sent a second LinkedIn message to Mr. Zhang on September 8, 2021. Krisp denies the remaining allegations in Paragraph 34.

35. Krisp admits that it sells product to call centers. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 35 and, therefore, denies the same.

36. Krisp admits that Mr. Baghdasaryan sent an email to Quentin Clark of General Catalyst on September 27, 2021 that stated, among other things, "I saw GC invested in Sanas.ai. Congrats!" and "We are quite interested in Accent Reduction technologies. It's good to see they are having progress. I would love to connect with the founders and start exploring future partnerships. Would you mind checking with them if there is an interest to connect?" Krisp denies the remaining allegations in Paragraph 36.

37. Krisp admits that on October 6, 2021, Mr. Baghdasaryan met over Zoom with Mr. Soderi.

38. Krisp admits that on October 10, 2021, Mr. Baghdasaryan sent an email message to Mr. Soderi and Mr. Serebryakov stating "I'll be in the Bay Area tomorrow (Mon.). Would be happy to meet you after Noon if that works for you. Pls let me know." Krisp further admits that no meeting occurred on October 10, 2021. Krisp admits that on October 11, 2021, Mr. Baghdasaryan responded to Sanas that his "flight got cancelled," "I won't be in the US for a couple of months. But we should certainly do another Zoom session, this time a deeper one. The main question we have is how this works in real-time. Experiencing it somehow would be really important for us." Krisp denies the remaining allegations in Paragraph 38.

39. Krisp admits that in October 2021, Sanas offered to "demo live" a "latest release." Krisp also admits that parties executed an NDA on November 17, 2021. Krisp denies the remaining allegations in Paragraph 39.

Krisp and Sanas' Non-Disclosure Agreement

40. Krisp admits that Krisp and Sanas executed an NDA that defined whether and how disclosed information could be designated as "Confidential information." Krisp denies the remaining allegations in Paragraph 40.

41. Krisp admits that it provided an initial draft of an NDA to Sanas and that the NDA states, in part, "each Party has disclosed, and may further disclose certain confidential technical and business information (in such capacity, a Party disclosing the information, the 'Discloser') to the other Party (in such capacity, a Party receiving the information, the 'Recipient'), that Discloser desires Recipient to treat as confidential." Krisp denies the remaining allegations in Paragraph 41.

42. Krisp admits that the NDA states, in part, "Recipient shall not use any Confidential Information of Discloser for any purpose except to evaluate and engage in discussions concerning the Opportunity." Krisp also admits that the NDA states, in part, "Recipient shall not reverse engineer, disassemble, or decompile any prototypes, software, samples, or other tangible objects that embody Discloser's Confidential Information and that are provided to Recipient under this Agreement." Krisp further admits that the NDA states, in part, "Nothing in this Agreement is intended to grant any rights to Recipient under any patent, mask work right or copyright of Discloser, nor shall this Agreement grant Recipient any rights in or to the Confidential Information of Discloser except as expressly set forth in this Agreement." Krisp denies the allegations in Paragraph 42.

43. Krisp admits that the NDA contains the following quote "Without limiting the foregoing, Recipient shall take at least those measures that it employs to protect its own confidential information of a similar nature and shall ensure that its employees who have access to Confidential Information of Discloser have signed a nonuse and non-disclosure agreement in content at least as protective of Discloser and its Confidential Information as the provisions of this Agreement, prior to any disclosure of Discloser's Confidential Information to such employees." Krisp denies the remaining allegations in Paragraph 43.

Krisp and Sanas' Year-Long Partnership Discussions and Technical Evaluation

44. Krisp admits that Krisp and Sanas explored a possible partnership. Krisp denies that Sanas disclosed any "Confidential Information" under the NDA. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 44 and, therefore, denies the same.

45. Krisp admits that Mr. Schoenfield's September 8, 2021 LinkedIn message to Mr. Zhang stated "we have 100's of global contact centers as customers for background noise removal and voice quality enhancements. I would like to explore licensing your tech and share more about our business and customers." Krisp further admits that on September 27, 2021, Mr. Baghdasaryan sent an email to Quentin Clark at General Catalyst stating, in part, "We are quite interested in Accent Reduction technologies. It's good to see they are having progress. I would love to connect with the founders and start exploring future partnerships." Krisp denies the remaining allegations in Paragraph 45.

46. Krisp admits that it sought to "explor[e] future partnerships" with Sanas and further admits that Krisp's intention was to go to market with Sanas' technology if the technology met Krisp's expectations. Krisp denies the remaining allegations in Paragraph 46.

47. Krisp admits that in 2021, Krisp had not yet fully developed its own accent translation technology. Krisp denies the remaining allegations in Paragraph 47.

48. Krisp admits that after the parties signed the NDA, Sanas and Krisp had a phone call in which an Indian actor dialed in during a Zoom meeting with a mobile phone to demonstrate Sanas' technology. Krisp admits that Sanas did not designate the demonstration, or anything else, as "Confidential Information" under the NDA. Krisp admits that on December 1, 2021 there was a meeting including Mr. Soderi, Mr. Serebryakov, Mr. Baghdasaryan, Mr. Minasyan, Mr. Schoenfield, and Ms. Walker. Krisp denies the remaining allegations in Paragraph 48.

49. Krisp admits that on January 13, 2022, Mr. Baghdasaryan sent an email that stated, in part, ”We discussed this internally and think there is a great opportunity to work together. I would like to take this a step further and introduce our engineering teams.” Krisp denies the remaining allegations in Paragraph 49.

50. Krisp admits that on January 18, 2022, Sanas delayed discussions with Krisp until “after our [fund]raise.” Krisp further admits that Mr. Schoenfield sent an email to Sanas on April 13, 2022 that stated “Checking in if there is an opportunity to engage with your solution.” Krisp denies the remaining allegations in Paragraph 50.

51. Krisp admits that the proposed Letter of Intent contains the following quotes: “Sanas will license its accent translation technology (the “Technology”) for integration into Krisp applications,” “Krisp will market the Technology and Sanas will help with accent-translation related content, collateral and expertise,” and “This letter of Intent does not create or constitute any legally binding or enforceable obligations or liabilities between the parties but rather indicates a genuine interest of Krisp Technologies, Inc. in licensing the Technology from Sanas, Inc.” Krisp denies the remaining allegations in Paragraph 51.

52. Krisp admits that on June 13, 2022, Mr. Baghdasaryan sent an email to Mr. Serebryakov stating “As discussed, our team will do a technical evaluation to get more comfortable with the quality and readiness of your technology. The goal is to perform this fast-track evaluation until Friday. We assume you have a CLI app that receives an audio file and returns a processed audio file. Such an app would make things faster.” Krisp further admits that this email stated “There are several things we would like to test” and contained the language quoted in the Paragraph 52 thereafter. Krisp denies the remaining allegations in Paragraph 52.

53. Krisp admits the existence of a Letter of Intent and a Slack channel. Krisp denies that the Slack channel contained any materials designated as "Confidential Information" under the NDA. Krisp denies the remaining allegations in Paragraph 53.

54. Krisp admits that Sanas sought an exclusivity agreement which was not entered into by the parties. Regarding Sanas' allegations directed to Sanas' purported "concern[]," Krisp lacks knowledge or information sufficient to form a belief as to the truth of such allegations and, therefore, denies the same. Krisp denies the remaining allegations in Paragraph 54.

55. Krisp admits that on August 16, 2022, Mr. Shoenfield stated in an email to Sanas that "we want to proceed with partnership." Krisp further admits that this email attached an "updated LOI" and noted that "[a]s this is the first time that we have integrated technology not developed within Krisp, we have technical and market diligence to perform for integration and performance" and that "Krisp needs to ensure we continue to deliver market-leading technology on behalf of our customers." Krisp denies the remaining allegations in Paragraph 55.

56. Krisp admits that on August 16, 2022, Mr. Shoenfield stated the quoted language in Paragraph 56, among other language, in an email to Sanas. Krisp denies the remaining allegations in Paragraph 56.

57. Krisp states that the revised Letter of Intent speaks for itself. Krisp denies the remaining allegations in Paragraph 57.

58. Krisp admits that it provided a "partial list of our open questions regarding the technical evaluation," which included the quoted bullet points reproduced in Paragraph 44, to Sanas. Krisp denies the remaining allegations in Paragraph 58.

59. Krisp admits that that on August 18, 2022, Mr. Keshava stated in an email to Mr. Schoenfield, "I would have hoped to add the non competitive clause as it just makes it easier for

technology teams to work together but we have an NDA and I am hopeful we can move past it." Krisp denies the remaining allegations in Paragraph 59.

60. Krisp denies the allegations in Paragraph 60.

61. Krisp denies the allegations in Paragraph 61.

62. Krisp admits that on August 16, 2022, Mr. Keshava stated in an email to Mr. Schoenfield, "Also, I wanted to reiterate the primary reason for both of us to partner should be to assert market dominance and hence would want to be aggressive on 2023 commitments once we do market diligence/validation and POC's. As long as we can commit to each other on volumes we would chase for next year by end of Dec I am fine with the construct of the partnership." Krisp admits that on August 17, 2022, Mr. Shoenfield stated in an email to Sanas, "We are aligned on the primary reason for both of us – to get to market and secure a first-mover footprint in the industry." Krisp denies the remaining allegations in Paragraph 62.

63. Krisp admits that on August 21, 2022, Mr. Shoenfield sent an email stating "Arto will lead our technical assessment process and will contact to schedule our teams." Krisp admits that on August 22, 2022, Mr. Minasyan "[a]dd[ed] Stepan who is Krisp's chief scientist, to the loop" via email. Krisp denies the remaining allegations in Paragraph 63.

64. Krisp admits that on August 23, 2022, Mr. Minasyan sent an email to Sanas and attached a document called "Questions_to_SANAS" that included the quoted language from Paragraph 48. Krisp denies the remaining allegations in Paragraph 64.

65. Krisp denies that Sanas provided any "Confidential Information" under the NDA. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 65 and, therefore, denies the same.

66. Krisp denies the allegations in Paragraph 66.

67. Paragraph 67 fails to identify any specific information or specific communications that Sanas alleges it provided to Krisp, and accordingly, Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 67 and, therefore, denies the same.

68. Krisp denies the allegations in Paragraph 68.

69. Krisp denies the allegations in Paragraph 69.

70. Krisp denies the allegations in Paragraph 70.

71. Krisp denies the allegations in Paragraph 71.

72. Krisp denies the allegations in Paragraph 72.

73. Krisp denies the allegations in Paragraph 73.

74. Krisp denies the allegations in Paragraph 74.

75. Krisp denies the allegations in Paragraph 75.

Krisp Terminates the Discussions and Copies Sanas' Product

76. Krisp admits that Mr. Keshava sent emails on October 24, 2022 and November 3, 2022. Krisp denies the remaining allegations in Paragraph 76.

77. Krisp admits that on November 4, 2022, Mr. Shoenfield sent an email to Sanas stating, "Things are very busy for us in the market. We have thought this through with our team and came to the conclusion that our two companies are not ready to engage seriously at this stage. The primary reasons are limited technology performance and integration visibility, and misalignment in business communication, which will adversely impact our customer relationships. We hope that this will change in the coming quarters as Sanas technology becomes more stable and Krisp's roadmap and priorities get more aligned with accent technology." Krisp denies the remaining allegations in Paragraph 77.

78. Krisp denies the allegations in Paragraph 78.

79. Krisp denies the allegations in Paragraph 79.

80. Krisp admits that it posted a "blog" post on April 27, 2023 titled "Krisp AI Accent Conversion: Get Ready for a Communication Revolution." Krisp denies the remaining allegations in Paragraph 80.

81. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 81.

82. Krisp admits that the URL https://krisp.ai/blog/krisp-accent-conversion/ contains the following quotes "We are excited to announce early access to our newest product release, Krisp AI Accent Conversion!" and "Now, we are excited to announce the addition of yet another game-changing technology to our offering: AI Accent Conversion. Our team at Krisp has been working tirelessly to create a technology that utilizes real-time inflection changes to help customers understand agents better by dynamically changing agents' accents into the customer's natively understood accent. This innovative product is designed to create better human-to-human connection and communication effectiveness for customers and call centers that are located outside of the United States in countries such as India and the Philippines." Krisp denies the remaining allegations in Paragraph 82.

83. Krisp admits that the URL https://krisp.ai/blog/krisp-accent-conversion/ contains the following quote "Krisp AI Accent Conversion supports a wide range of Indian accent dialects, making it an ideal solution for BPOs with India-based call center operations. Soon to follow are accent conversion packs for English-speaking Filipino, South African, and Chinese call center agents." Krisp denies the remaining allegations in Paragraph 83.

84. Krisp denies the allegations in Paragraph 84.

85. Krisp denies the allegations in Paragraph 85.

86. Krisp admits that its products are the result of Krisp's own hard work and innovation. Krisp also admits that the URL https://krisp.ai/about-us/ contains the following quote: "Every day we solve problems that we have never seen in the past. We solve these problems by working hard, constantly learning, adapting, and in the end - always get things done despite obstacles along our path." Krisp denies the remaining allegations in Paragraph 86.

87. Krisp denies the allegations in Paragraph 87.

88. Krisp denies the allegations in Paragraph 88.

Krisp's False Advertising

89. Krisp denies the allegations in Paragraph 89.

90. Krisp denies the allegations in Paragraph 90.

91. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/ contains the title "Krisp vs Sanas: Accent Conversion Comparison," the date April 21, 2025, and the quote "This document is intended for contact center operators to assess the quality and performance of Krisp AI Accent Conversion (also known as Accent Translation, Accent Neutralization, or Accent Smoothing) with Sanas's offering." Krisp denies the remaining allegations in Paragraph 91.

92. Krisp admits that Sanas' lawyers sent a letter dated August 28, 2025 titled "Krisp's False Advertising on 'Krisp v Sanas: Accent Conversion Comparison' blog post." Krisp denies the remaining allegations in Paragraph 92.

93. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/ contains the following quotes: "Indian English," "Filipino English," "Headset robustness," "Requires specific headsets," "Headset and application compatibility," "New entrant,

minimal deployments and testing," "8kHz only," "Voice quality," "Over 30K agents," "Over 200K contact center agents," "Customer-side only," "Customer-side Noise Cancellation," "Not available," "Background noise and voice cancellation robustness," "Very limited," "Voice Preservation mode – somewhat preserves the user's voice," "Wrong pronunciations," "Noticeably more frequent," "Preserves user's voice," "Limited," "Agent-side Noise Cancellation," "Adequate performance for low-volume noises (fan, for example) Noise leakage and voice degradation in contact center environments (other voices, loud chatter)," "Remote deployment and settings for admis," "App version management and auto-update," "Very Limited," "Analytics for Accent Conversion, Noise Cancellation and platform usage," "Not available," "Enterprise-Grade Support," and "24/7 Limited." Krisp denies the remaining allegations in Paragraph 93.

94. Krisp denies the allegations in Paragraph 94.

95. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/ contains the following quotes: "Objective evaluation methodology and metrics" and "These metrics offer an additional, unbiased perspective into the perceptual and technical performance of each solution." Krisp denies the remaining allegations in Paragraph 95.

96. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/ contains the following quotes: "For objective evaluation, the same 70 pairs of recordings were processed." Krisp denies the remaining allegations in Paragraph 96.

97. Krisp denies the allegations in Paragraph 97.

98. Krisp denies the allegations in Paragraph 98.

99. Krisp admits that it has purchased a Google ad describing Krisp as a "Better Sanas AI alternative." Krisp denies the remaining allegations in Paragraph 99.

100. Krisp admits that Sanas' lawyers sent an August 28, 2025 letter. The letter speaks for itself. Krisp denies the remaining allegations in Paragraph 100.

101. Krisp admits that, through counsel, it sent a letter dated September 9, 2025, in which Krisp "categorically denies engaging in any conduct that would constitute false advertising under applicable law." Krisp denies the remaining allegations in Paragraph 101.

102. Krisp admits that the April 21, 2025 blog post can be accessed on the internet. Krisp denies any "ongoing publication of the 2025 ACC Blog Post." Krisp denies the remaining allegations in Paragraph 102.

103. Krisp denies the allegations in Paragraph 103.

104. Krisp admits the existence of blog posts. Krisp denies the remaining allegations in Paragraph 104.

105. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-noise-cancellation-comparison/ is contains the following quotes: "Win," "Customer-side Noise Cancellation," "Not available," "Error message in Sanas app with older CPUs," "Users often need to restart the drivers to avoid breakdown of mic and speaker audio streams," "Over 30K agents," "Over 200 thousand contact center agents," "Agent-side Noise Cancellation," "Adequate performance for low volume noises (fan, for example)," "Noise leakage and voice degradation in contact center environments (other voices, loud chatter)," "New entrant, minimal deployments and testing," "Headset and application compatibility," "Remote deployment and settings for admins," "Limited," "App version management and auto-update," "Limited," "Analytics for Noise Cancellation and Usage," "Not available," "Enterprise-Grade Support," "24/7 Limited." Krisp denies any false or misleading statements. Krisp denies the remaining allegations in Paragraph 105.

106. Krisp denies the allegations in Paragraph 106.

107. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-inbound-noise-cancellation-comparison/ contains the following quotes: "Up to 8 kHz," "Inbound noise cancellation announced in May 2025; production readiness unverified," "Deployment through SDK," "Unknown," "sanas-inbound," "up to 8 kHz," "Single Speaker*," "krisp-nc-i-v8-pro," "Limited." Krisp denies any false or misleading statements. Krisp denies the remaining allegations in Paragraph 107.

108. Krisp denies the allegations in Paragraph 108.

109. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-inbound-noise-cancellation-comparison/ contains the following quotes: "Objective Evaluation," and "Key Takeaways." Krisp denies the remaining allegations in Paragraph 109.

110. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-inbound-noise-cancellation-comparison/ contains the following quotes: "Objective Evaluation - POLQA" and "Meta's AudioBox Aesthetics." Krisp denies the remaining allegations in Paragraph 110.

111. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-inbound-noise-cancellation-comparison/ contains the following quotes: "Subjective Evaluation – Crowdsourced A/B testing" and "We processed 24 noisy audio samples using both krisp-viva-v6-lite and sanas-inbound, then submitted them for evaluation," "krisp-viva-v6-lite – 704 votes," and "sanas-inbound – 256 votes." Krisp denies the remaining allegations in Paragraph 111.

112. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-inbound-noise-cancellation-comparison/ contains a table under the title "Evaluation Results" and lists "Krisp" under a "Winner" column for seven rows. Krisp denies the remaining allegations in Paragraph 112.

113. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-noise-cancellation-comparison/ contains the following quotes "Comparative audio samples," "Contact center-specific noises," and "Original conditions." Krisp denies the remaining allegations in Paragraph 113.

114. Krisp denies the allegations in Paragraph 114.

115. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 115, and, therefore, denies the same.

116. Krisp denies the allegations in Paragraph 116.

117. Krisp denies the allegations in Paragraph 117.

118. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-noise-cancellation-comparison/ contains the following quotes: "2x more" and "i5-8th Gen CPU." Regarding Sanas' allegation about Sanas alleged "own internal testing," Krisp lacks knowledge or information sufficient to form a belief as to the truth of such allegations. Krisp denies the remaining allegations in Paragraph 118.

119. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 119, and, therefore, denies the same.

120. Krisp denies the allegations in Paragraph 120.

121. Krisp admits that Sanas' lawyers sent a letter on September 12, 2025. Krisp denies the remaining allegations in Paragraph 121.

122. Krisp denies the allegations in Paragraph 122.

Krisp Misleads the U.S. Patent and Trademark Office

123. Krisp admits that it obtained patent protection on its proprietary inventions from the USPTO. Krisp denies the remaining allegations in Paragraph 123.

124. Krisp admits that it filed provisional application number 63/528,251 on July 21, 2023 to which '609 and '979 Patents claim priority. Krisp also admits that the URL https://krisp.ai/blog/krisp-ai-accent-conversion-v3/ contains the quote "This milestone validates our unique approach to accent transformation." Krisp denies the remaining allegations in Paragraph 124.

125. Krisp admits that the '609 Patent's Abstract states:

> Techniques are described for generating parallel data for real-time speech form conversion. In an embodiment, based at least in part on input speech data of an original form, a speech machine learning (ML) model generates parallel speech data. The parallel speech data includes the input speech data of the original form and temporally aligned output speech data of a target form different than the original form. Each frame of the input speech data temporally corresponds to the corresponding output speech frame of the target speech form and contains a same portion of the particular content. The techniques further include training a teacher machine learning model that is offline and is substantially larger than a student machine learning model for converting speech form. Transferring "knowledge" from the trained Teacher model for training the Production Student Model that performs the speech form conversion on an end-user computing device.

Krisp also admits that the '979 Patent's Abstract states:

> Techniques are described for generating parallel data for real-time speech form conversion. In an embodiment, based at least in part on input speech data of an original form, a speech machine learning (ML) model generates parallel speech data. The parallel speech data includes the input speech data of the original form and temporally aligned output speech data of a target form different than the original form. Each frame of the input speech data temporally corresponds to the corresponding output speech frame of the target speech form and contains a same portion of the particular content. The techniques further include training a teacher machine learning model that is offline and is substantially larger than a student machine learning model for converting speech form. Transferring "knowledge" from the trained Teacher model for training the Production Student Model that performs the speech form conversion on an end-user computing device.

Krisp denies the remaining allegations in Paragraph 125.

126. Krisp denies the allegations in Paragraph 126.

127. Krisp denies the allegations in Paragraph 127.

128. Krisp admits that the figure reproduced in Paragraph 128 appears to be Figure 7 from the '609 and '979 Patents. Krisp also admits that the '609 and '979 Patents state "FIG. 7 is a block diagram that depicts a process of training the Student ML Algorithm using the Teacher ML Model, in one or more embodiments." Krisp denies the remaining allegations in Paragraph 128.

129. Krisp admits that claims 1, 13, and 19 of the '609 Patent recite the following words: "teacher machine learning (ML) model," "parallel speech data," and "a student machine learning algorithm." Krisp denies the remaining allegations in Paragraph 129.

130. Krisp admits that claims 1, 12, and 19 of the '979 Patent recite the following words: "a first machine learning model," "a second machine learning model," and "comparing a subset of a second plurality of parameters of the second machine learning model with a corresponding subset of the first plurality of parameters of the first machine learning model." Krisp denies the remaining allegations in Paragraph 130.

131. Krisp denies the allegations in Paragraph 131.

DIVISIONAL ASSIGNMENT

132. Paragraph 132 alleges legal conclusions to which no response is required. To the extent a response is required, Krisp admits that Sanas' First Amended Complaint purports to be an intellectual property action. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 132 and, therefore, denies the same.

PATENTS-IN-SUIT

133. Krisp admits that this action purports to state a cause of action concerning U.S. Patent Nos. 11,948,550 ("the '550 Patent"), 12,125,496 ("the '496 Patent"), 12,131,745 ("the '745 Patent"), 11,715,457 ("the '457 Patent"), 12,412,561 ("the '561 Patent"), and 12,417,756 ("the

756 Patent") (together, the "Asserted Patents"). Krisp denies any patent infringement or that Plaintiff is entitled to any relief or damages.

U.S. Patent No. 11,948,550

134. Krisp admits that the '550 Patent, on its face, is titled "REAL-TIME ACCENT CONVERSION MODEL." Krisp denies that the '550 Patent was "duly and legally issued," but admits that the face of the patent identifies an issuance date of April 2, 2024 and lists Mr. Serebryakov and Mr. Zhang as inventors. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 134, and, therefore, denies the same.

135. Krisp admits that the '550 Patent, on its face, lists 22 claims (3 independent and 19 dependent). Krisp denies the remaining allegations in Paragraph 135.

136. Krisp denies the allegations in Paragraph 136.

137. Krisp admits that Exhibit A appears to be a true and correct copy of the '550 Patent.

U.S. Patent No. 12,125,496

138. Krisp admits that the '496 Patent, on its face, is titled "METHODS FOR NEURAL NETWORK-BASED VOICE ENHANCEMENT AND SYSTEMS THEREOF." Krisp denies that the '496 Patent was "duly and legally issued," but admits that the face of the patent identifies an issuance date of October 22, 2024 and identifies Shawn Zhang, Lukas Pfeifenberger, Jason Wu, Piotr Dura, David Braude, Bajibabu Bollepalli, Alvaro Escudero, Gokce Keskin, Ankita Jha, and Maxim Serebryakov as the named inventors. Krisp lacks knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 138, and, therefore, denies the same.

139. Krisp admits that the '496 Patent, on its face, lists 20 claims (3 independent and 17 dependent). Krisp denies the remaining allegations in Paragraph 139.

140. Krisp denies the allegations in Paragraph 140.

141. Krisp admits that Exhibit B appears to be a true and correct copy of the '496 Patent.

U.S. Patent No. 12,131,745

142. Krisp admits that the '745 Patent, on its face, is titled "SYSTEM AND METHOD FOR AUTOMATIC ALIGNMENT OF PHONETIC CONTENT FOR REAL-TIME ACCENT CONVERSION." Krisp denies that the '745 Patent was "duly and legally issued," but admits that the '745 Patent lists an issuance date of October 29, 2024 and lists Lukas Pfeifenberger and Shawn Zhang as the named inventors. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 142, and, therefore, denies the same.

143. Krisp admits that the '745 Patent, on its face, lists 20 claims (3 independent and 17 dependent). Krisp denies the remaining allegations in Paragraph 143.

144. Krisp denies the allegations in paragraph 144.

145. Krisp admits that Exhibit C appears to be a true and correct copy of the '745 Patent.

U.S. Patent No. 11,715,457

146. Krisp admits that the '457 Patent, on its face, is titled "REAL TIME CORRECTION OF ACCENT IN SPEECH AUDIO SIGNALS." Krisp denies that the '457 Patent was "duly and legally issued," but admits that the '457 Patent, on its face, lists an issuance date of August 1, 2023 and identifies Andrei Golman and Dmitrii Sadykov as the named inventors. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 146, and, therefore, denies the same.

147. Krisp admits that the '457 Patent, on its face, lists 20 claims (3 independent and 17 dependent). Krisp denies the remaining allegations in Paragraph 147.

148. Krisp admits that Exhibit D appears to be a true and correct copy of the '457 Patent.

U.S. Patent No. 12,412,561

149. Krisp admits that the '561 Patent, on its face, is titled "REAL-TIME CORRECTION OF ACCENT IN SPEECH AUDIO SIGNALS." Krisp denies that the '561 Patent was "duly and legally issued," but admits that the '561 Patent lists an issuance date of September 9, 2025, and lists Andrei Golman and Dmitrii Sadykov as the named inventors. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 149, and, therefore, denies the same.

150. Krisp admits that the '561 Patent, on its face, lists 18 claims (6 independent and 12 dependent). Krisp denies the remaining allegations in Paragraph 150.

151. Krisp admits that Exhibit E appears to be a true and correct copy of the '561 Patent.

U.S. Patent No. 12,417,756

152. Krisp admits that the '756 Patent, on its face, is titled "SYSTEMS AND METHODS FOR REAL-TIME ACCENT MIMICKING." Krisp denies that the '756 Patent was "duly and legally issued," but admits that the '756 Patent lists an issuance date of September 16, 2025, and lists Ankita Jha, Lukas Pfeifenberger, Piotr Dura, David Braude, Alvaro Escudero, Shawn Zhang, Maxim Serebryakov, and Sharath Keshava Narayana as the inventors and Sanas as its assignee. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in paragraph 152, and, therefore, denies the same.

153. Krisp admits that the '756 Patent, on its face, lists 20 claims (3 independent and 17 dependent). Krisp denies the remaining allegations in Paragraph 153.

154. Krisp admits that Exhibit F appears to be a true and correct copy of the '756 Patent.

155. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 155, and, therefore, denies the same.

156. Krisp lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in Paragraph 156, and, therefore, denies the same.

KRISP'S WILLFUL INFRINGEMENT OF SANAS' PATENTS

157. Krisp admits that it has developed, made, marketed, offered for sale, and sold a product called "AI Accent Conversion" which has previously been referred to as "Accent Localization." Krisp denies the remaining allegations in Paragraph 157.

158. Krisp denies the allegations in Paragraph 158.

159. Krisp denies the allegations in Paragraph 159.

160. Krisp admits that U.S. Patent Nos. 12,205,609 and 12,223,979, on their face, cite the '496 Patent, the '457 Patent, and Patent Application Publication Nos. 2022/0358903 and 2024/0347070. Krisp denies the remaining allegations in Paragraph 160.

161. Krisp denies the allegations in Paragraph 161.

162. Krisp denies the allegations in Paragraph 162.

163. Krisp denies the allegations in Paragraph 163.

COUNT ONE: INFRINGEMENT OF U.S. PATENT 11,948,550

164. Krisp incorporates by reference its responses to Paragraphs 1 through 163 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

165. Krisp denies the allegations in Paragraph 165.

166. Krisp admits that the URL https://platform.softwareone.com/product/ai-accent-conversion/PCP-0771-2958 contains the following quote "Accent Conversion enhances communication for customers and call centers by softening accents while preserving the speaker's voice for authenticity and personal connection in every interaction." Krisp denies the remaining allegations in Paragraph 166.

167. Krisp admits that the URL https://krisp.ai/blog/deep-dive-ai-accent-conversion-for-call-centers/ contains the following quotes: "If high-quality parallel data are available, the accent conversion model can be implemented as a single neural network algorithm trained to directly map input accented speech to target native speech." And "This entails generating a native target-accent sounding output for each accented speech input, maintaining consistent emotions, naturalness, and vocal characteristics, and achieving an ideal frame-by-frame alignment with the input data." Krisp admits that the video at the URL https://www.youtube.com/shorts/uV3xJ5-Sna8 contains the following quote "This mode keeps my original voice intact while softening challenging parts of my accent." And "Notice how my natural tone and personality shine through." Krisp denies the remaining allegations in Paragraph 167.

168. Krisp admits that the URL https://krisp.ai/blog/deep-dive-ai-accent-conversion-for-call-centers/ appears to contain the image reproduced in Paragraph 168. Krisp denies the remaining allegations in Paragraph 168.

169. Krisp admits that it has filed patent applications related to accent conversion technology that it has developed. Krisp denies the remaining allegations in Paragraph 169.

170. Krisp denies the allegations in Paragraph 170.

171. Krisp denies the allegations in Paragraph 171.

172. Krisp denies the allegations in Paragraph 172.

173. Krisp denies the allegations in Paragraph 173.

174. Krisp denies the allegations in Paragraph 174.

175. Krisp denies the allegations in Paragraph 175.

176. Krisp denies the allegations in Paragraph 176.

177. Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 177 and, therefore, denies the same

COUNT TWO: INFRINGEMENT OF U.S. PATENT 12,125,496

178. Krisp incorporates by reference its responses to Paragraphs 1 through 177 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

179. Krisp denies the allegations in Paragraph 179.

180. Krisp denies the allegations in Paragraph 180.

181. Krisp admits that the URL https://krisp.ai/blog/deep-dive-ai-accent-conversion-for-call-centers/ contains the following quote "The speech synthesis part of the model, which is sometimes referred to as the vocoder algorithm in research, should produce a high-quality, natural-sounding speech waveform. It is expected to sound closer to the target accent, have high intelligibility, be low-latency, convey natural emotions and intonation, be robust against noise and background voices, and be compatible with various acoustic environments." Krisp denies the remaining allegations in Paragraph 181.

182. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/ contains the following quotes: "Background noise and voice cancellation robustness," "Highly robust, automatically included in the Accent Conversion models," and "Krisp maintains speech quality in real-world noisy conditions, including multi-speaker and contact center environments." Krisp denies the remaining allegations in Paragraph 182.

183. Krisp denies the allegations in Paragraph 183.

184. Krisp denies the allegations in Paragraph 184.

185. Krisp denies the allegations in Paragraph 185.

186. Krisp denies the allegations in Paragraph 186.

187. Krisp denies the allegations in Paragraph 187.

188. Krisp denies the allegations in Paragraph 188.

189. Krisp denies the allegations in Paragraph 189.

190. Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 190 and, therefore, denies the same.

COUNT THREE: INFRINGEMENT OF U.S. PATENT 12,131,745

191. Krisp incorporates by reference its responses to Paragraphs 1 through 190 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

192. Krisp denies the allegations in Paragraph 192.

193. Krisp admits that the URL https://krisp.ai/blog/deep-dive-ai-accent-conversion-for-call-centers/ contains the following quotes "However, getting precise alignment is exceedingly challenging due to variations in the duration of phoneme pronunciations. Nonetheless, improved alignment accuracy contributes to superior results." and "This entails generating a native target-accent sounding output for each accented speech input, maintaining consistent emotions, naturalness, and vocal characteristics, and achieving an ideal frame-by-frame alignment with the input data." and contains an image with the words "Utterance alignment." Krisp denies the remaining allegations in Paragraph 193.

194. Krisp denies the allegations in Paragraph 194.

195. Krisp denies the allegations in paragraph 195.

196. Krisp denies the allegations in Paragraph 196.

197. Krisp denies the allegations in Paragraph 197.

198. Krisp denies the allegations in Paragraph 198.

199. Krisp denies the allegations in Paragraph 199.

200. Krisp denies the allegations in Paragraph 200.

201. Krisp denies the allegations in Paragraph 201.

202. Krisp denies the allegations in Paragraph 202.

203. Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 203 and, therefore, denies the same

COUNT FOUR: INFRINGEMENT OF U.S. PATENT 11,715,457

204. Krisp incorporates by reference its responses to Paragraphs 1 through 203 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

205. Krisp denies the allegations in Paragraph 205.

206. Krisp admits that the figure reproduced in Paragraph 206 appears to be from Krip's website. Krisp denies the remaining allegations in Paragraph 206.

207. Krisp admits that the figure reproduced in Paragraph 207 appears to be from the URL https://help.krisp.ai/hc/en-us/articles/18308013509916-Krisp-Accent-Conversion-user-guide#h_01JK7XAEKXB4DAB12KN021ZTX4. Krisp denies the remaining allegations in Paragraph 207.

208. Krisp admits that the URL https://krisp.ai/blog/krisp-vs-sanas-accent-conversion-comparison/ contains the following quotes "Audio Latency," and "220ms." Krisp denies the remaining allegations in Paragraph 208.

209. Krisp denies the allegations in Paragraph 209.

210. Krisp denies the allegations in Paragraph 210.

211. Krisp denies the allegations in Paragraph 211.

212. Krisp denies the allegations in Paragraph 212.

213. Krisp denies the allegations in Paragraph 213.

214. Krisp denies the allegations in Paragraph 214.

215. Krisp denies the allegations in Paragraph 215.

216. Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 216 and, therefore, denies the same.

COUNT FIVE: DECLARATORY JUDGMENT

(Co-Inventorship and Co-Ownership Over U.S. Patent Nos. 12,205,609 and 12,223,979)

217. Krisp incorporates by reference its responses to Paragraphs 1 through 216 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

218. Krisp denies the allegations in Paragraph 217.

219. Krisp admits that the '609 Patent's Abstract states:

> Techniques are described for generating parallel data for real-time speech form conversion. In an embodiment, based at least in part on input speech data of an original form, a speech machine learning (ML) model generates parallel speech data. The parallel speech data includes the input speech data of the original form and temporally aligned output speech data of a target form different than the original form. Each frame of the input speech data temporally corresponds to the corresponding output speech frame of the target speech form and contains a same portion of the particular content. The techniques further include training a teacher machine learning model that is offline and is substantially larger than a student machine learning model for converting speech form. Transferring "knowledge" from the trained Teacher model for training the Production Student Model that performs the speech form conversion on an end-user computing device.

Krisp also admits that the '979 Patent's Abstract states:

> Techniques are described for generating parallel data for real-time speech form conversion. In an embodiment, based at least in part on input speech data of an original form, a speech machine learning (ML) model generates parallel speech data. The parallel speech data includes the input speech data of the original form and temporally aligned output speech data of a target form different than the original form. Each frame of the input speech data temporally corresponds to the corresponding output speech frame of the target speech form and contains a same portion of the particular content. The techniques further include training a teacher machine learning model that is offline and is substantially larger than a student machine learning model for converting speech form. Transferring "knowledge"

> from the trained Teacher model for training the Production Student Model that performs the speech form conversion on an end-user computing device.

Krisp further admits that claims 1, 13, and 19 of the '609 Patent recite the words "teacher machine learning (ML) model," "parallel speech data," and "a student machine learning algorithm." Krisp denies the remaining allegations in Paragraph 219.

220. Krisp denies the allegations in Paragraph 220.

221. Krisp denies the allegations in Paragraph 221.

222. Krisp denies the allegations in Paragraph 222.

223. Krisp denies the allegations in Paragraph 223.

224. Krisp admits that Sanas purports to seek a declaration that the Sanas employees are co-inventors of the '609 and '979 Patents and that Sanas owns a *pro rata* undivided interest in the '609 and '979 Patents. Krisp denies the remaining allegations in Paragraph 224.

COUNT SIX: MISAPPROPRIATION OF TRADE SECRETS

(Violation of the Defend Trade Secrets Act, 18 U.S.C. § 1836)

225. Krisp incorporates by reference its responses to Paragraphs 1 through 224 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

226. Krisp denies the allegations in Paragraph 226.

227. Krisp admits that the parties executed an NDA. Regarding the allegations related to "Sanas employees" and "Licensees of Sanas," Krisp lacks knowledge or information sufficient to form a belief as to the truth of such allegations and, therefore, denies the same. Krisp denies the remaining allegations in Paragraph 227.

228. Krisp denies the allegations in Paragraph 228.

229. Krisp denies the allegations in Paragraph 229.

230. Krisp denies the allegations in Paragraph 230.

231. Krisp denies the allegations in Paragraph 231.

232. Krisp denies the allegations in Paragraph 232.

233. Krisp denies the allegations in Paragraph 233.

234. Krisp denies the allegations in Paragraph 234.

COUNT SEVEN: MISAPPROPRIATION OF TRADE SECRETS

(Violation of the California Uniform Trade Secrets Act, Cal. Civ. Code § 3426 et seq.)

235. Krisp incorporates by reference its responses to Paragraphs 1 through 234 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

236. Krisp denies the allegations in Paragraph 236.

237. Krisp denies the allegations in Paragraph 237.

238. Krisp denies the allegations in Paragraph 238.

239. Krisp denies the allegations in Paragraph 239.

240. Krisp denies the allegations in Paragraph 240.

241. Krisp denies the allegations in Paragraph 241.

242. Krisp denies the allegations in Paragraph 242.

243. Krisp denies the allegations in Paragraph 243.

COUNT EIGHT: INFRINGEMENT OF U.S. PATENT 12,412,561

244. Krisp incorporates by reference its responses to Paragraphs 1 through 243 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

245. Krisp denies the allegations in Paragraph 245.

246. Krisp admits the screenshot is from Krisp's website. Krisp denies the remaining allegations in Paragraph 246.

247. Krisp admits the screenshot is from Krisp's website. Krisp denies the remaining allegations in Paragraph 247.

248. Krisp admits the screenshot is from Krisp's website. Krisp denies the remaining allegations in Paragraph 248.

249. Krisp admits that as of the date the Sanas' First Amended Complaint was filed, it has knowledge that the '561 Patent exists. Krisp denies the remaining allegations in Paragraph 249.

250. Krisp denies the allegations in Paragraph 250.

251. Krisp denies the allegations in Paragraph 251.

252. Krisp denies the allegations in Paragraph 252.

253. Krisp denies the allegations in Paragraph 253.

254. Krisp denies the allegations in Paragraph 254.

255. Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 255 and, therefore, denies the same.

COUNT NINE: INFRINGEMENT OF U.S. PATENT 12,417,756

256. Krisp incorporates by reference its responses to Paragraphs 1 through 255 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

257. Krisp denies the allegations in Paragraph 257.

258. Krisp denies the allegations in Paragraph 258.

259. Krisp denies the allegations in Paragraph 259.

260. Krisp admits the screenshot is from Krisp's website. Krisp denies the remaining allegations in Paragraph 260.

261. Krisp admits that as of the date the Sanas' First Amended Complaint was filed, it has knowledge that the '756 Patent exists. Krisp denies the allegations in Paragraph 261.

262. Krisp denies the allegations in Paragraph 262.

263. Krisp denies the allegations in Paragraph 263.

264. Krisp denies the allegations in Paragraph 264.

265. Krisp denies the allegations in Paragraph 265.

266. Krisp denies the allegations in Paragraph 266.

267. Krisp lacks the knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 267 and, therefore, denies the same.

COUNT TEN: FALSE ADVERTISING

(Violation of the Lanham Act, 15 U.S.C. § 1125(a))

268. Krisp incorporates by reference its responses to Paragraphs 1 through 267 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

269. Krisp denies the allegations in Paragraph 269.

270. Krisp denies the allegations in Paragraph 270.

271. Krisp denies the allegations in Paragraph 271.

272. Krisp denies the allegations in Paragraph 272.

273. Krisp denies the allegations in Paragraph 273.

274. Krisp denies the allegations in Paragraph 274.

275. Krisp denies the allegations in Paragraph 275.

276. Krisp denies the allegations in Paragraph 276.

277. Krisp denies the allegations in Paragraph 277.

278. Krisp denies the allegations in Paragraph 278.

279. Krisp denies the allegations in Paragraph 279.

COUNT ELEVEN: UNFAIR COMPETITION

(Violation of Cal. Bus. & Prof. Code § 17200 *et seq.*)

280. Krisp incorporates by reference its responses to Paragraphs 1 through 279 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

281. Krisp denies the allegations in Paragraph 281.

282. Krisp denies the allegations in Paragraph 282.

283. Krisp denies the allegations in Paragraph 283.

COUNT ELEVEN: FALSE ADVERTISING

(Violation of Cal. Bus. & Prof. Code § 17500 *et seq.*)

284. Krisp incorporates by reference its responses to Paragraphs 1 through 283 of Sanas' First Amended Complaint and denies that Plaintiff is entitled to any relief or damages.

285. Krisp denies the allegations in Paragraph 285.

286. Krisp denies the allegations in Paragraph 286.

287. Krisp denies the allegations in Paragraph 287.

288. Krisp denies the allegations in Paragraph 288.

PRAYER FOR RELIEF

Krisp denies that Plaintiff is entitled to any relief in connection with the allegations in Sanas' First Amended Complaint, including, without limitation, Paragraphs A–AA in the Prayer for Relief.

DEMAND FOR JURY TRIAL

This paragraph sets forth Plaintiff's demand for a jury trial to which no response is required.

AFFIRMATIVE DEFENSES

Based on information and belief, Krisp asserts the following defenses and reserves the right to amend its defenses and to add additional defenses, including, without limitation, defenses revealed during discovery. Krisp assets its defenses as set forth below.

First Affirmative Defense: Non-Infringement

Sanas is not entitled to any relief on its patent infringement claims because Krisp does not and has not infringed, induced infringement, or contributorily infringed, directly, indirectly, willfully or otherwise, one or more of the asserted claims of the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents literally or under the doctrine of equivalents.

Second Affirmative Defense: Invalidity

One or more of the claims of the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents are invalid and/or unenforceable for failing to satisfy the conditions of patentability set forth in Title 35 of the United States Code, including, without limitation, 35 U.S.C. §§ 101, 102, 103, and/or 112.

Third Affirmative Defense: Limitation on Damages

Sanas’ claim for damages are limited, in whole or in part, pursuant to 35 U.S.C. §§ 284, 286 and/or 287.

Fourth Affirmative Defense: No Injunctive Relief

Sanas is not entitled to injunctive relief as a matter of law and cannot satisfy the requirements applicable to its request for injunctive relief in any form. Sanas cannot demonstrate irreparable harm, as any damages it could demonstrate are remedied by monetary damages.

Fifth Affirmative Defense: Prosecution History Estoppel

Sanas is barred, under the doctrine of prosecution history disclaimer and prosecution history estoppel, from construing the claims of the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents in such a way as they may cover any accused products by reasons of statements made to the United

States Patent and Trademark Office during prosecution of the applications which led to the issuance of the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents.

Sixth Affirmative Defense: Equitable Defenses (Patent Misuse/Unclean Hands)

Sanas is barred from recovery in whole or in part by the doctrines of patent misuse and/or unclean hands to the extent that it has attempted to use the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents to obtain market benefit beyond that which inures in the statutory patent right. Sanas’ maintenance of the present suit in order to obtain market benefit beyond the narrow patent rights reflected in the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents constitute patent misuse and/or unclean hands.

Seventh Affirmative Defense: No Attorneys’ Fees

Krisp has a good faith belief that the ’550, ’496, ’745,’457, ’561, and/or ’756 Patents are invalid, not infringed, and/or unenforceable, and thus Sanas cannot obtain attorneys’ fees or costs and cannot demonstrate an exceptional case under 35 U.S.C. § 285.

Eighth Affirmative Defense: No Requisite Specificity

Sanas’ trade secret claims are barred because Sanas has not identified its alleged trade secrets with the requisite specificity (for example, as required by Cal. Code Civ. Proc. § 2019.210 or otherwise).

Ninth Affirmative Defense: Independent Development

Sanas’ trade secret claims and co-inventorship/co-ownership claims are barred because Krisp developed its technology and patented inventions independently without using any of Sanas’ alleged trade secrets or confidential information.

Tenth Affirmative Defense: Public Information

Sanas' trade secret claims are barred because Sanas' alleged trade secrets and confidential information are in the public domain.

Eleventh Affirmative Defense: No Reasonable Secrecy

Sanas' trade secret claims are barred because Sanas' failed to take reasonable secrecy measures to protect its alleged trade secrets and confidential information.

Twelfth Affirmative Defense: Readily Ascertainable

Sanas' trade secret claims are barred because Sanas' alleged trade secrets and confidential information are readily ascertainable.

Thirteenth Affirmative Defense: Authorized Use

Sanas' trade secret claims are barred because Krisp was not prohibited from using any information from Sanas under the governing NDA.

Fourteenth Affirmative Defense: No Confidential Information

Sanas' trade secret claims are barred because Sanas failed to designate any information as "Confidential Information" per the governing NDA.

Fifteenth Affirmative Defense: No Independent Economic Value

Sanas' trade secret claims are barred because the alleged trade secret information does not derive independent economic value.

Sixteenth Affirmative Defense: No Misappropriation

Sanas' trade secret claims are barred because Krisp has not misappropriated any trade secrets of Sanas.

Seventeenth Affirmative Defense: Insignificant Contribution

Sanas' co-inventorship/co-ownership claims are barred because neither Sanas nor any of its employees made a more than insignificant contribution to one or more of Krisp's patent claims.

Eighteenth Affirmative Defense: No Joint Behavior

Sanas' co-inventorship/co-ownership claims are barred because Sanas did not engage in the requisite joint behavior with Krisp.

Nineteenth Affirmative Defense: No Assignment

Sanas' co-ownership claims are barred because the Sanas employees alleged as joint inventors to Krisp's patents did not assign the requisite alleged inventive rights to Sanas or have an obligation to do so.

Twentieth Affirmative Defense: No False or Misleading Statements

Sanas' false advertising claims are barred because Krisp did not make any false or misleading statements. For example, no alleged statement was: false or misleading; false or misleading at the time made; more than non-actionable puffery; or more than non-actionable opinion.

Twenty-First Affirmative Defense: No Deception

Sanas' false advertising claims are barred because no Krisp statements deceived (or was likely to deceive) in a material way or otherwise.

Twenty-Second Affirmative Defense: No Damage, Injury, or Causation

Sanas' false advertising claims are barred because no Krisp statement has caused or was likely to cause injury or damage to Sanas, whether such was competitive, commercial, or otherwise.

Twenty-Third Affirmative Defense: Truth

Sanas' false advertising claims are barred because the alleged statements were trueat the time made.

Twenty-Fourth Affirmative Defense: No Unlawful, Unfair, or Fraudulent Acts

Sanas' unfair competition claim is barred because Krisp did not engage in any unlawful, unfair, or fraudulent business acts or practice.

Twenty-Fifth Affirmative Defense: Laches

Each of Sanas claims is barred because Sanas unreasonably delayed bringing the present action in a prejudicial way.

PRAYER FOR RELIEF

WHEREFORE, Krisp respectfully requests entry of judgment that:

A. Finds in favor of Krisp and against Sanas;

B. Denies Sanas' prayer for injunctive relief;

C. Finds in favor of Krisp and against Sanas on Krisp's affirmative defenses;

D. Finds that the claims of the '550, '496, '745,'457, '561, and/or '756 Patents are invalid;

E. Finds that Krisp has not infringed the '550, '496, '745,'457, '561, and/or '756 Patents;

F. Finds that neither Sanas nor any Sanas employee is an inventor of (or has an ownership interest in) Krisp's '609 and '979 Patents.

G. Finds that Krisp has not misappropriated any trade secrets;

H. Finds that Krisp has not engaged in any false advertising;

I. Finds that Krisp has not engaged in any unfair competition;

J. Declares that this case is exceptional under 35 U.S.C. § 285 in favor of Krisp;

K. Awards Krisp its costs and attorneys' fees incurred in this action; and

L. Grants such other and further relief as the Court may deem just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, Krisp respectfully demands a trial by jury on all triable issues.

December 15, 2025

Respectfully Submitted,

By: */s/ Chris R. Schmidt*

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