From:	Stephen Zinda
To:	Todd Nelson; Herb Mondros
Cc:	Farnan, Kelly E.; Caras, Valerie A.; David Cabello; James Hall; Munira Jesani; Stephanie Holden; John Watkins
Subject:	HAAS, Inc. v. Emergency Safety Solutions, Inc. - Submission of Stipulation
Date:	Monday, October 19, 2026 1:05:00 PM

Counsel,

Petitioner HAAS, Inc. ("HAAS") is filing a petition for *inter partes* review ("IPR") with the Patent Trial and Appeal Board (PTAB) in IPR2027-00016 ("the IPR") against U.S. Patent No. 12,109,938. HAAS hereby stipulates that, if IPR is instituted, then in *Emergency Safety Solutions, Inc. v. HAAS, Inc. d/b/a HAAS Alert*, Case No. 1:26-cv-00838 (D. Del.) ("the Parallel Litigation"), HAAS will not advance against the claims challenged in the instituted IPR: (i) the specific grounds asserted in the instituted IPR; (ii) any ground that reasonably could have been raised in the instituted IPR (i.e., any ground that reasonably could have been raised under §§ 102 or 103 on the basis of prior art patents or printed publications); or (iii) any other ground based on a combination of system art with any prior art reference asserted as the basis of a ground in the instituted IPR. *See Sotera Wireless, Inc. v. Masimo Corporation*, IPR2020-01019, Paper 12 (PTAB Dec. 1, 2020); *Tesla, Inc. v. BulletProof Property Mgmt., LLC*, IPR2026-00204, Paper 14 at 2-3 (Dir. June 15, 2026). In so stipulating, HAAS seeks to avoid multiple proceedings in different forums addressing the validity of the claims challenged in the instituted IPR based on the same grounds or prior art. For avoidance of doubt, this stipulation shall only apply to asserted claims in the Parallel Litigation to the extent IPR is instituted in the IPR proceeding challenging those claims and is not later vacated, reversed, or otherwise withdrawn, including by rehearing or Director Review.

Regards,

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HAAS - **Ex. 1019**
IPR2027-00016
HAAS, Inc. *v.* Emergency Safety Solutions, Inc.