

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

KRISP TECHNOLOGIES INC.,
Petitioner

v.

SANAS.AI INC.,
Patent Owner

Post Grant Review Case No. PGR2026-00032
U.S. Patent No. 12,412,561

**PETITIONER'S OPPOSITION TO PATENT OWNER'S
REQUEST FOR DISCRETIONARY DENIAL**

TABLE OF CONTENTS

I.	INTRODUCTION.....	1
II.	THE PETITION IS AN EARLY CHALLENGE TO CORRECT A VERY RECENT AND IMPROVIDENTLY GRANTED PATENT.....	3
A.	THE BOARD WILL RESOLVE PATENTABILITY BEFORE THE DISTRICT COURT.....	4
B.	THERE ARE NO SETTLED EXPECTATIONS WARRANTING DISCRETIONARY DENIAL	5
C.	THE '561 PATENT RECEIVED INSUFFICIENT PROSECUTION	5
III.	PETITIONER'S BROAD <i>SOTERA</i> STIPULATION CONFIRMS PETITIONER IS USING THE PTAB AS A TRUE ALTERNATIVE	7
A.	PETITIONER'S BROAD <i>SOTERA</i> STIPULATION REMOVES ANY OVERLAP CONCERN	7
B.	RESOLVING PATENTABILITY AT THE PTAB WILL MATERIALLY SIMPLIFY THE DISTRICT COURT LITIGATION	9
C.	THE DISTRICT COURT HAS INVESTED LITTLE TO NO EFFORT IN DECIDING VALIDITY	10
D.	THE BOARD'S TECHNICAL EXPERIENCE IS PARTICULARLY VALUABLE FOR THE '561 PATENT	11
IV.	OTHER CONSIDERATIONS DO NOT FAVOR DENIAL	12
A.	<i>MAGNOLIA</i> SUPPORTS INSTITUTION, NOT DENIAL, ON THESE FACTS	12
B.	PETITIONER DID NOT ENGAGE IN IMPROPER EXPERT GAP FILLING.....	14
C.	PATENT OWNER'S "OFFSHORING" ARGUMENTS ARE MISPLACED	15
D.	OTHER <i>FINTIV</i> FACTORS DO NOT FAVOR DISCRETIONARY DENIAL	18
V.	CONCLUSION.....	19

TABLE OF AUTHORITIES

CASES

<i>Am. Airlines, Inc. v. Intellectual Ventures I LLC</i> , IPR2025-00785, Paper 11 (Director Aug. 29, 2025).....	10
<i>Anthony Inc. v. Controltec, LLC</i> , IPR2025-00559, Paper 9 (Director Rev. July 16, 2025)	6
<i>Apple Inc. v. Fintiv, Inc.</i> , IPR2020-00019, Paper 15 (PTAB May 13, 2020)	18
<i>BOE Tech. Grp. Co., Ltd. v. Optronix Scis. LLC</i> , IPR2024-01130, Paper 16 (PTAB Jan. 27, 2025)	19
<i>Int'l Test Sols., Inc. v. Mipox Int'l Corp.</i> , No. 16-CV-00791-RS, 2017 WL 1316549 (N.D. Cal. Apr. 10, 2017)	18
<i>iRhythm Technologies, Inc. v. Welch Allyn, Inc.</i> , IPR2025-00363, Paper 10 (Director June 6, 2025)	14
<i>Magnolia Medical Techs., Inc. v. Kurin, Inc.</i> , IPR2026-00097, Paper 17 (Director May 14, 2026)	2
<i>Motorola Sols., Inc. v. Stellar, LLC</i> , IPR2024-01205, Paper 19 (PTAB Mar. 28, 2025)	8
<i>Multi-Color Corp. v. Brook & Whittle Ltd.</i> , PGR2025-00025, Paper 10 (PTAB July 16, 2025)	3
<i>Nissan Motor Co., Ltd. v. Longhorn Auto. Grp. LLC</i> , IPR2025-01089, Paper 10 (Director Oct. 17, 2025)	10
<i>Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC</i> , IPR2019-01393, Paper 24 (PTAB Jun. 16, 2020 (informative)).....	18
<i>Tesla, Inc. v. Bulletproof Property Mgmt., LLC</i> , IPR2026-00204, Paper 14 (Director June 15, 2026)	1
<i>Tesla, Inc. v. Intellectual Ventures II LLC</i> , IPR2025-00217, Paper 9 (Director June 13, 2025)	11

STATUTES

35 U.S.C. § 101	1, 8, 10, 11
35 U.S.C. § 102	1, 8, 10, 11
35 U.S.C. § 103	passim
35 U.S.C. § 112	1, 8, 11
35 U.S.C. § 321(c).....	3

REGULATIONS

37 C.F.R. § 42.105	24
37 C.F.R. § 42.105(b).....	24

37 C.F.R. § 42.6(e)	24
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I. INTRODUCTION

Krisp is using the AIA process in the manner Congress and the Office intended—as a true alternative to district court litigation, as a preferred PGR, and to determine whether a recently issued patent was improvidently granted.

There is no scheduled trial date, an institution decision will occur before the district court’s *Markman* hearing, the district court has not invested any resource in prior art-based invalidity questions, and Petitioner has provided a broad *Sotera* stipulation removing any possibility of overlap—granting institution of this PGR will preclude validity challenges under 35 U.S.C. §§ 101, 102, 103, and 112 in the district court, including based on prior art systems. Under these types of facts, the Office has recently found the AIA review to function as intended. *Tesla, Inc. v. Bulletproof Property Mgmt., LLC*, IPR2026-00204, Paper 14 at 2–3 (Director June 15, 2026) (“*Tesla*”) (“The absence of a scheduled trial date and Petitioner’s broad stipulation reduces the concern of inconsistent outcomes or significant duplication of efforts, and allows this AIA review to function as an alternative to the co-pending litigation.”). Patent Owner’s request is fundamentally premised on speculation regarding future district court events. With no scheduled trial date, and a district court that will not even schedule a trial until after the *Markman* hearing, Patent Owner asks the Office to deny review based on a hypothetical future schedule that does not exist. Thus, this case is distinctly unlike cases where the Board has denied

institution based on an imminent trial or substantial district court investment in overlapping validity issues.

Further, the '561 Patent issued in 2025, went from filing to allowance with only a double patenting rejection, and none of the relevant audio processing prior art references were identified during prosecution. Accordingly, consideration of this PGR on the merits would further serve the stated, central purpose of AIA proceedings. *Magnolia Medical Techs., Inc. v. Kurin, Inc.*, IPR2026-00097, Paper 17 at 2 (Director May 14, 2026) (“the central purpose of IPRs is to determine whether the patent at issue may have been improvidently granted and whether and to what extent that right should continue to be recognized by all.”).

Patent Owner attempts to overcome these facts and policy rationales—which strongly favor referral—by dressing up the procedural posture in the district court, non-patent claims at issue in the district court case, and other irrelevant considerations. However, if anything, these considerations also weigh towards referral because if the Office grants institution, then Petitioner’s broad *Sotera* stipulation will remove invalidity considerations under §§ 101, 102, 103, and 112 from the district court, thus allowing the district court to focus on the non-patent claims and further judicial economy.

Accordingly, Krisp respectfully requests the Office deny Patent Owner’s Request for Discretionary Denial of Institution.

II. THE PETITION IS AN EARLY CHALLENGE TO CORRECT A VERY RECENT AND IMPROVIDENTLY GRANTED PATENT

The Office has stated that “Petitions for post-grant review are favored because they must be filed no later than nine months from the grant of the patents (35 U.S.C. § 321(c)), are close in time to examination, and occur before expectations in the patent rights are strongly settled.” *Multi-Color Corp. v. Brook & Whittle Ltd.*, PGR2025-00025, Paper 10, at 2–3 (PTAB July 16, 2025). Additionally, the Director recently emphasized that the “central purpose” of IPRs—which equally applies to this PGR—is determining whether a patent may have been improvidently granted. *Magnolia*, at 2. Few cases present that concern more strongly than this one. Here, Petitioner has timely filed a preferred PGR, the ’561 Patent went from filing to allowance with only one rejection (double patenting) and no reasonable examination. EX1002, 149–157. Reviewing the patentability of the ’561 Patent accordingly serves the stated “central purpose[,] to determine whether the patent at issue may have been improvidently granted and whether and to what extent that right should continue to be recognized by all.” *Magnolia*, at 2. Nor should timing dissuade the Board from reviewing these legitimate concerns. The Board will resolve patentability before the Northern District of California. There is no scheduled trial date, and available statistics indicate a Final Written Decision will significantly predate trial. Further, there are no settled expectations for the ’561 Patent which issued in 2025.

A. The Board Will Resolve Patentability Before the District Court

There is no scheduled trial date. *See* EX2010. Further, a trial date will not be scheduled until after the *Markman* hearing which is currently set for October 22, 2026. Accordingly, even if not pushed back—which is a regular occurrence in the Northern District of California—an institution decision will predate even the scheduling of a trial date in this case. This alone weighs strongly against discretionary denial. “The absence of a scheduled trial date and Petitioner’s broad stipulation reduces the concern of inconsistent outcomes or significant duplication of efforts, and allows this AIA review to function as an alternative to the co-pending litigation.” *Tesla*, at 2–3. Patent Owner bears the burden of showing any concerns regarding duplicative proceedings justify discretionary denial. Here, however, Patent Owner cannot identify any scheduled trial date, much less one expected to occur before the Board’s Final Written Decision. Under these circumstances, concerns regarding inefficiency, inconsistent outcomes, or duplication of effort are highly speculative.

Trial statistics for patent cases in the Northern District of California indicate trial will likely occur (at the earliest) around January 2028—months after the September 2027 FWD deadline. *See* EX1043, 9.¹ Moreover, as Patent Owner points

¹ Petitioner used the most conservative and lowest statistic of 30 months, but as the exhibit shows, time to trial would likely much longer.

out, there are numerous other complex non-patent claims in the district court litigation, including trade secret misappropriation, false advertising, and various unfair competition claims. Thus, it is likely that the time to trial will be extended even further than the average for patent cases. These facts weigh strongly against discretionary denial and the concerns addressed by *Fintiv* factor 2.

B. There are No Settled Expectations Warranting Discretionary Denial

Patent Owner has no settled expectations in the '561 Patent because it issued in September 2025, about six months prior to the filing of the Petition. EX1002, 246. Further, the Petition was filed less than nine months after the district court litigation commenced. This Petition is a timely, favored challenge to recently issued claims. *Multi-Color Corp.*, at 2–3 (“Petitions for post-grant review are favored . . .”); *see also Tesla*, at 4 (“Petitioner . . . brought an early challenge to each patent in the above-captioned proceedings . . . within two years of issuance.”). As such, Patent Owner cannot show settled expectations to justify discretionary denial.

The '561 Patent is recently issued, Petitioner did not delay after suit was filed, and Patent Owner identifies no sufficient reason to convert a recently issued patent into a settled expectation. Referral is appropriate.

C. The '561 Patent Received Insufficient Prosecution

During prosecution of the '561 Patent, the examiner performed a single, insufficient prior art search. EX1002, 117–148. As such, the examiner only issued a

single office action on the grounds of double patenting against the applicant's prior application. EX1002, 149–157. The Office and the public have a strong interest in ensuring that the '561 Patent was not “improvidently granted” due to insufficient examination. *Magnolia*, at 2. Because the Petition presents substantial prior art questions that were not meaningfully tested during examination (or ever, by any forum), referral advances the public's interest in the economy.

Such an insufficient examination—i.e., failing to issue any non-double patenting prior art rejections over the broad subject matter in the '561 Patent—demonstrates that the most relevant prior-art teachings were not meaningfully considered before issuance. Under these circumstances, Board review would directly serve the Office's interest in determining whether the challenged claims were improvidently granted. “[I]t is an appropriate use of Office resources to review” where “Petitioner appears to show a material error by the Office.” *Anthony Inc. v. Controltec, LLC*, IPR2025-00559, Paper 9 (Director Rev. July 16, 2025).

The Examiner's stated reason for allowance was that the prior art did not teach, disclose or suggest the limitation to “synthesizing a spectrum representation based on the acoustic features, the linguistic features, and a speaker embedding for a human speaker” as found in claim 1. EX1002, 176–177. But that allowance rationale rested on a materially deficient search. As detailed in the Petition, such broad limitation was obvious over available prior art. Referral is again appropriate.

III. PETITIONER'S BROAD *SOTERA* STIPULATION CONFIRMS PETITIONER IS USING THE PTAB AS A TRUE ALTERNATIVE

Petitioner's broad *Sotera* stipulation confirms that Petitioner is using the AIA process exactly as intended: "to provide a quick and cost-effective alternative to district court patent litigation for resolving disputes over patent validity." *Magnolia*, at 2. First, the language of the stipulation removes any overlap concern. Second, resolving patentability at the PTAB would materially simplify the district court litigation. Third, the district court has invested no effort in prior art validity questions. Finally, the Board's technical experience is particularly valuable for the '561 Patent. Accordingly, Petitioner's broad stipulation strongly supports referral. *Tesla*, at 2–3 ("The absence of a scheduled trial date and Petitioner's broad stipulation reduces the concern of inconsistent outcomes or significant duplication of efforts, and allows this AIA review to function as an alternative to the co-pending litigation.").

A. Petitioner's Broad *Sotera* Stipulation Removes Any Overlap Concern

Petitioner timely filed a broad *Sotera* stipulation² that eliminates any overlap between this PGR and the district court litigation. *See Fintiv* factor 4. Krisp

² Patent Owner's "delayed" stipulation argument is misplaced. Request, 10, n.1. There are no timing concerns as the stipulation is based on the future institution decision. Patent Owner presents no reason or authority why the timing of Petitioner's stipulation would make it ineffective.

thoroughly stipulated it would not bring any overlapping claims, i.e., “(1) the specific grounds raised in PGR2026-00032; or (2) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding.” EX1039, 2. Because invaliding grounds under 35 U.S.C. §§ 101, 102, 103, and 112 (including based on prior art systems) are available in PGRs, Petitioner’s stipulation would remove such invalidity considerations from the district court.

Such a broad stipulation goes above and beyond what the Office has recently determined to be a “broad” and sufficient stipulation. *Tesla*, at 2–3 (“Petitioner also stipulates that it will not advance in the parallel litigation any ground that reasonably could have been raised in an *inter partes* review (‘IPR’) and any other ground based on a combination of system art with any prior art reference asserted as the basis of a ground in each IPR.”).

Patent Owner is wrong that Petitioner’s stipulation “is materially insufficient to satisfy the core *Sotera* requirements because it does not include a commitment to forego any ground that could have reasonably been raised with respect to combinations of system art in this proceeding[.]” Paper 7 (“Request”), 10. Petitioner’s stipulation—“any other grounds that could have reasonably been raised before the PTAB in [this PGR2026-00032]” (EX1039, 2)—***specifically includes system art***. Accordingly, Patent Owner’s reliance on *Motorola Sols., Inc. v. Stellar, LLC*, IPR2024-01205, Paper 19 (PTAB Mar. 28, 2025), is misplaced.

Petitioner's stipulation therefore strongly supports referral for merits review because it ensures that this PGR will serve as a true alternative to district court litigation.

B. Resolving Patentability at the PTAB Will Materially Simplify the District Court Litigation

Referral would also materially simplify the district court litigation. As Patent Owner identifies, the district court litigation case involves several non-patent claims including trade secrets, false advertising, and unfair competition. On top of these claims are Sanas's patent infringement claims for six asserted patents. Accordingly, Sanas's patent claims amount to a significant portion of a large district court case. Krisp has challenged all six Sanas asserted patents at the PTAB. Board review of the IPR Petitions would therefore eliminate overlapping §§ 102 and 103 issues, and Board review of the PGRs (including the present Petition) would eliminate overlapping §§ 101, 102, 103, and 112 issues, thus significantly reducing the burden on the court and the parties.

Thus, this PGR would serve as an efficient and true alternative to district court invalidity litigation, and referral will allow the PTAB to resolve patentability and allow the district court to focus on the non-patent claims.

C. The District Court Has Invested Little to No Effort in Deciding Validity

The district court has invested little to no effort in actual validity questions. Further, the time for the district court to do so will not even be scheduled until after an institution decision is due in this PGR.

This Office routinely finds that there is insignificant investment in the litigation where—as here—the institution decision predates the *Markman* hearing. *See e.g., Am. Airlines, Inc. v. Intellectual Ventures I LLC*, IPR2025-00785, Paper 11 at 3 (Director Aug. 29, 2025) (finding little investment in the litigation based on Petitioners’ argument that *Markman* would occur after institution); *cf. Nissan Motor Co., Ltd. v. Longhorn Auto. Grp. LLC*, IPR2025-01089, Paper 10 at 2 (Director Oct. 17, 2025) (finding meaningful investment because *Markman* was scheduled prior to institution deadline). The district court will not conduct the *Markman* hearing until roughly a month after institution (October 22, 2026). EX2010, 2. Accordingly, *Fintiv* factor 3 strongly favors a merits referral.

The district court’s single³ determination of a Motion to Dismiss under 35 U.S.C. § 101 does not mean the court has invested any effort into the §§ 102/103

³ Patent Owner egregiously mischaracterizes the procedural posture surrounding Petitioner’s Motion to Dismiss in the district court. Request, at 7 (citing EX2004; EX2005; EX2007; EX2008). EX2004 and EX2005 had nothing to do with Sanas’ six asserted patents at issue in the Petitions—they regarded a motion to dismiss the non-patent claims. And EX2007 was a one-paragraph discussion about the posture of Federal Rules of Civil Procedure 12(b)(6) and 12(c).

issues presented to the Board (where the present PGR only presents § 103 grounds). And Petitioner’s stipulation assures the district court will not reach any overlapping issues on §§ 101, 102, 103, or 112. Thus, even accepting Patent Owner’s characterization of the district court proceedings, the court has not invested resources in adjudicating any issue that overlaps with the prior art challenges presented here. Accordingly, the district court has not “expended substantial resources . . . on the issues presented in the Petition.” *Magnolia*, at 10.

D. The Board’s Technical Experience is Particularly Valuable for the ’561 Patent

Additionally, the Board’s technical expertise is particularly valuable for the patents at issue in Krisp’s Petitions. There are six challenged patents which involve various aspects of audio processing where the level of ordinary skill in the art includes an advanced degree in computer engineering, computer science, electrical engineering, or a related field. The Board’s composition of judges who have both the requisite technical and legal expertise, in addition to the number of six challenged patents, makes the PTAB the best forum to resolve the presented prior art-based invalidity questions for the challenged patents. *Am. Airlines*, IPR2025-00785, at 3 (the Board “is better suited to review a large number of patents involving diverse subject matter.”); see *Tesla, Inc. v. Intellectual Ventures II LLC*, IPR2025-00217, Paper 9 at 2–3 (Director June 13, 2025) (“*Tesla IP*”).

In sum, the district court has not invested any resources into the questions the PTAB would resolve, the district court will not even set a time to do so until after the institution decision in this PGR, and Petitioner’s broad *Sotera* stipulation ensures the district court will never adjudicate overlapping issues with this PGR—issues which the Board’s experience is particularly geared to resolve. Referral is strongly favored.

IV. OTHER CONSIDERATIONS DO NOT FAVOR DENIAL

Faced with a set of facts which clearly favor referral, Patent Owner attempts to advance several irrelevant positions. These positions are primarily irrelevant and, regardless, fail to overcome facts such as no scheduled trial date, a recently issued patent, no proper prosecution, Petitioner’s broad *Sotera* stipulation, and an institution decision before the *Markman* hearing.

A. *Magnolia* Supports Institution, Not Denial, on These Facts

Patent owner urges the Board to discretionarily deny institution because the ’561 Patent is part of a “broader, advanced litigation” with a series of other patent and non-patent claims. Request, 1. Patent Owner argues that “*Magnolia* explains that AIA reviews are undermined when they mirror district court litigation by relying on overlapping prior art or arguments.” Request, 8. There is no such concern here because the district court ruled on one Rule 12(c) motion regarding § 101, the present PGR (and each of Petitioner’s six Petitions against Patent Owner’s patents) only

comprises § 103 grounds, and Petitioner’s stipulation assures the district court will not adjudicate any overlapping §§ 101, 102, 103, or 112 issues if instituted.

Patent Owner further argues that a stay is unlikely because the district court has already denied a motion to dismiss addressing a § 101 challenge. Request, 12. However, “the mere existence of co-pending litigation in and of itself may not necessarily raise concerns,” and none of the claims in the co-pending litigation meet the concerns laid out in *Magnolia*. *Magnolia*, at 3–4. *Magnolia*’s concern was duplication of patent-validity adjudication, not the existence of additional causes of action proceeding in parallel. Because the trade secret, false advertising, and unfair competition claims do not present any patentability issues, their existence does not create the inefficiencies *Magnolia* sought to avoid.

Contrary to Patent Owner’s suggestion, *Magnolia* does not establish a broad rule favoring discretionary denial whenever parallel litigation exists. Rather, *Magnolia* involved an extraordinary procedural posture in which trial had already occurred, the jury had already considered validity, and the petitioner sought Office review after extensive adjudication of overlapping issues. The present case occupies the opposite end of the spectrum. No trial date has been set, the district court has not adjudicated any prior art-based invalidity challenge such as those presented in this PGR, and Petitioner’s broad *Sotera* stipulation eliminates any realistic risk of overlapping validity determinations. The non-patent claims and unrelated patent

claims have no relation to those concerns. Additionally, as addressed above, Petitioner provided a comprehensive and broad *Sotera* stipulation that alleviates all risk of substantive overlap with this proceeding. As such, this PGR would be “a quick and cost-effective alternative to district court patent litigation for resolving disputes over patent validity.” *Magnolia*, at 2.

Furthermore, Patent Owner’s reliance on the existence of non-patent claims actually underscores why institution would promote efficiency. Because the parallel litigation includes trade-secret, false-advertising, and unfair-competition claims, eliminating overlapping patent validity disputes through Petitioner’s broad *Sotera* stipulation would allow the district court to focus its resources on the numerous issues that will remain regardless of the outcome of this proceeding. Institution therefore narrows—not expands—the issues requiring district court adjudication.

B. Petitioner Did Not Engage in Improper Expert Gap Filling

Patent Owner is wrong that “the Petition depends heavily on expert testimony to supply missing elements of its invalidity theories[.]” Request, 17. Indeed, every limitation is directly mapped, and Patent Owner does not identify any allegedly missing limitation which could be filled by the expert. *iRhythm Technologies, Inc. v. Welch Allyn, Inc.*, IPR2025-00363, Paper 10 at 2 (Director June 6, 2025) (the patent owner did “not identify any portions of the expert testimony that suggest Petitioner is using its expert to fill gaps in the prior art.”).

Patent Owner's main argument appears to be that there are a certain number of references and motivations to combine used in Petitioner's § 103 combination. Request, at 18–19. However, this is not a valid discretionary denial, or merits, consideration. Patent owners cannot PGR-proof their patents by claiming combinations of well-known prior art concepts in obvious ways. Indeed, this is why 35 U.S.C. § 103 exists. If Patent Owner has any true issue with Petitioner's motivations to combine (which are currently unstated), referral on the merits is the appropriate mechanism to resolve such disputes.

C. Patent Owner's "Offshoring" Arguments Are Misplaced

Patent Owner's position that discretionary denial is favored under the Director's March 11, 2026 Memorandum ("Memo") should be rejected. The Memo addresses whether products accused of infringement are produced in the United States, the extent a patent owner's products are manufactured in the United States, and whether petitioner is a small business. The Memo seeks to address the long-term trend of U.S. companies moving operations overseas (i.e., offshoring). Memo., 1-2.

This case does not present the type of offshoring concerns identified in the March 11, 2026 Memorandum. Both parties maintain significant United States operations and both participate in global technology markets with employees outside the United States. The relevant inquiry is not whether a party has employees outside the United States, but whether discretionary denial would advance the policy

concerns identified in the Memorandum. On the present record, Patent Owner has not shown that those concerns support denial.

Indeed, Patent Owner conducts its business in much the same way for which it chides Petitioner. The record evidence establishes that since its founding Sanas has materially shifted operations outside the United States. Sanas's SVP of Engineering & Managing Director, Nitesh Varshney, stated that as of November 20, 2025, Sanas has close to 100 employees in India while only 75 outside India. EX1040 (audio file of video available at <https://www.youtube.com/watch?v=B8MlRKodVhg>), 43:31-43:46. On that testimony alone, even assuming all of those 75 are in the U.S., that is only about 43% of Patent Owner's workforce. And that assumption is likely overstated as Mr. Varshney also stated that Sanas' scientists are based in a variety of other countries such as "Spain, Austria, Germany, Poland, [and] Korea" along with the U.S. and India. *Id.*, at 27:40-28:14. With work spread between a variety of other nations, the number of U.S.-based employees is likely much lower than 43%.

Nor does the record not support Patent Owner's assertion that Sanas's technical leadership and development activity remain centered in the United States. For example, Mr. Varshney himself is based out of Bengaluru, India, and is both Sanas' SVP of Engineering and Managing Director. EX1041, 1; EX1042, 1. Mr. Varshney described a wide variety of development teams based in India:

We have a team which works on neural networks. We have a team which works on machine learning. We have a team which takes care of inference, taking our model from initial speech chunks to making a continuous stream. We have a team which works on our management platform which makes it scalable to 100 million users going forward. We have a team which works on our app delivery mechanisms by which our algorithms can work on tiny desktops without taking any speech out of their environment.

EX1040, at 45:38-46:17 (cleaned up). Sanas may have been founded in the United States and may maintain some U.S.-based roles, but those facts do not justify any application of the March 11, 2026 Memorandum that would favor this Patent Owner.

Similarly, Petitioner was founded in the United States and is just as much, if not more, United States-centric than Patent Owner:

- U.S. incorporation and headquarters
- Over 20 U.S.-based employees including Chief Commercial Officer, EVP of Licensing and Partnerships, Senior Directors of Sales and Customer Experience, and Directors of Corporate Marketing and Channel Partnerships
- U.S.-based operations including sales, customer success, channel partnerships, corporate marketing, and licensing functions
- U.S.-owned intellectual property including U.S. patents
- U.S.-based commercial decisions including customer acquisition, pricing, channel strategy, and partnership licensing

Accordingly, the March 11, 2026 Memorandum does not favor discretionary denial.

D. Other Fintiv Factors do Not Favor Discretionary Denial

Fintiv Factor 1 (existence of a stay) is neutral. Neither party has requested a stay in the district court litigation. Where a stay has neither been requested nor granted, “[t]his factor does not weigh for or against discretionary denial.” *Apple Inc. v. Fintiv, Inc.*, IPR2020-00019, Paper 15 at 12 (PTAB May 13, 2020) (designated informative July 13, 2020) (“*Fintiv I*”). As Patent Owner notes in its Request, “[i]n the absence of specific evidence, [the Board] will not attempt to predict’ whether a district court will grant a stay (see *Sand Revolution II, LLC v. Continental Intermodal Group-Trucking LLC*, IPR2019-01393, Paper 24 at 7 (PTAB Jun. 16, 2020 (informative)))[.]” Request, 12. The Board generally “decline[s] to infer, based on actions taken in different cases with different facts, how the District Court would rule should a stay be requested[.]” *Fintiv II*, 12. Accordingly, because a stay has neither been requested nor granted, this factor does not weigh for or against discretionary denial.

Patent Owner’s reliance on *Int’l Test Sols., Inc. v. Mipox Int’l Corp.*, No. 16-CV-00791-RS, 2017 WL 1316549 (N.D. Cal. Apr. 10, 2017) is misplaced. The stay in that case was denied without prejudice primarily because the PTO had “not yet acted” on the petitions filed a “little more than one week before a dispositive *Markman* hearing” and the court expressly stated the movant “may renew the motion if the PTAB grants any of its IPR petitions.” *Id.* at *1–4. In fact, *Int’l Test Sols* stated

“Courts in this district favor granting stays” for example “[w]here discovery has not yet been completed and a trial date has not been set[.]” *Id.* at *2. Such would be the case here where an intuition decision will predate both the close of discovery and the scheduling of a trial date.

Fintiv Factor 5 (same petitioner and defendant) weighs in favor of a merits referral. *Fintiv* Factor 5 follows *Fintiv* Factor 2 (trial date proximity) in how it is weighted for or against discretionary denial. *See, e.g., BOE Tech. Grp. Co., Ltd. v. Optronic Scis. LLC*, IPR2024-01130, Paper 16 at 13 (PTAB Jan. 27, 2025) (Factor 5 follows Factor 2). Thus, because *Fintiv* Factor 2 strongly favors referral, *Fintiv* Factor 5 also favors referral or, at the very least, is neutral.

V. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests this PGR be referred to the merits panel and that PGR of the Challenged Claims be instituted.

Respectfully submitted,

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APPENDIX OF EXHIBITS

Exhibit 1001	U.S. Patent No. 12,412,561 (“561 Patent”)
Exhibit 1002	Prosecution History of U.S. Patent No. 12,412,561 (“561 FH”)
Exhibit 1003	Declaration of Chris Schmandt
Exhibit 1004	U.S. Patent Application Publication No. 2020/0193971 to Feinauer et al. (“ <i>Feinauer</i> ”)
Exhibit 1005	U.S. Patent No. 12,106,749 to Prabhavalkar et al. (“ <i>Prabhavalkar</i> ”)
Exhibit 1006	U.S. Patent Application Publication No. 2023/0223006 to Fan et al. (“ <i>Fan</i> ”)
Exhibit 1007	U.S. Patent Application Publication No. 2020/0066296 to Sargsyan et al. (“ <i>Sargsyan</i> ”)
Exhibit 1008	U.S. Patent No. 7,319,959 to Watts (“ <i>Watts</i> ”)
Exhibit 1009	U.S. Patent Application Publicaiton No. 2012/0116756 to Kalinli (“ <i>Kalinli</i> ”)
Exhibit 1010	<i>Accentron: Foreign Accent Conversion to Arbitrary Non-Native Speakers Using Zero-Shot Learning</i> to Zhao et al. (“ <i>Accentron</i> ”)
Exhibit 1011	<i>Intentionally left blank</i>
Exhibit 1012	S. Ding, et al., Improving the Speaker Identity of Non-Parallel Many-to-Many Voice Conversion with Adversarial Speaker Recognition (“ <i>Ding</i> ”)
Exhibit 1013	Priority Chinese Patent Publication No. 202010996501 to Fan et al. and Certified English Translation
Exhibit 1014	Excerpts of the Prosecution History for the U.S. Patent Application Publication No. 2023/0223006 to Fan et al. (“ <i>FanHistory</i> ”)
Exhibit 1015	Priority PCT 2022/057759 to Fan et al. and Certified English Translation
Exhibit 1016	Munford Librarian Declaration
Exhibit 1017	C. Xydeas, Differential Encoding Techniques Applied to Speech Signals, 1978 (“ <i>Xydeas</i> ”)
Exhibit 1018	U.S. Patent Application Publication No. 2013/0246064 to Wasserblat et al. (“ <i>Wasserblat</i> ”)
Exhibit 1019	U.S. Patent Application Publication No. 2021/0272571 to Balasubramaniam et al. (“ <i>Balasubramaniam</i> ”)
Exhibit 1020	U.S. Patent Application Publication No. 2020/0294492 to Sypniewski et al. (“ <i>Sypniewski</i> ”)
Exhibit 1021	C. Schmandt, <i>Voice Communication with Computers</i> , Van Nostrand Reinhold, 1994 (“ <i>Schmandt</i> ”)

Exhibit 1022	C. O’Callaghan, Pitch, (https://web.archive.org/web/20150930164248/http://caseyocallaghan.com/research/papers/Pitch.pdf) September 30, 2015, (“O’Callaghan”)
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Exhibit 1030	L. Sun, <i>Phonetic Posteriorgrams For Many-To-One Voice Conversion Without Parallel Data Training</i> , IEEE on Multimedia and Expo, August 29, 2016 (“Sun”)
Exhibit 1031	G. Zhao et. al, <i>Converting Foreign Accent Speech Without a Reference</i> , IEEE/ACM Transactions On Audio, Speech, and Language Processing, Vol. 29, 2021, 2367-2381 (“Zhao”)
Exhibit 1032	U.S. Patent Application Publication No. 2022/0122579 to Biadsky et al. (“Biadsky”)
Exhibit 1033	U.S. Patent Appl. No. 2018/0174595 to Dirac et al. (“Dirac”)
Exhibit 1034	L. Roberts, <i>Understanding the Mel Spectrogram</i> , (https://medium.com/analytics-vidhya/understanding-the-mel-spectrogram-fca2afa2ce53), March 5, 2020 (“Roberts”)
Exhibit 1035	N. Umeda, <i>Consonant duration in American English</i> , The Journal of the Acoustical Society of America, March 1, 1977 (“Umeda”)
Exhibit 1036	U.S. Patent Application No. 2010/0274554 to Orr et al. (“Orr”)
Exhibit 1037	U.S. Patent No. 11,410,658 to Ma et al. (“Ma”)

Exhibit 1038	U.S. Patent Application No. 2019/0392798 to Danjyo et al. (<i>Danjyo</i>)
Exhibit 1039	Petitioner's Stipulation
Exhibit 1040	Audio of Interview with Nitesh Varshney
Exhibit 1041	Nitesh Varshney LinkedIn Profile
Exhibit 1042	Screenshot of YouTube Video Description
Exhibit 1043	Time to Trial Statistics for N.D. Cal.

**CERTIFICATE OF SERVICE ON PATENT OWNER
UNDER 37 C.F.R. § 42.105**

Pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(b), the undersigned certifies that on June 25, 2026, a complete and entire copy of this *Opposition to Patent Owner's Request for Discretionary Denial* and Exhibits was served via electronic filing with the Board and via Electronic Mail on the following practitioners of record for Patent Owner:

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Respectfully submitted,

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