Sanas.AI Inc. v. Krisp Technologies Inc., 3:25-cv-05666 (N.D. Cal.)

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Counsel,

Krisp has filed IPR and PGR Petitions challenging the claims of the following patents: 12,131,745 (IPR2026-00274); 11,715,457 (IPR2026-00275); 12,412,561 (PGR2026-00032); 11,948,550 (IPR2026-00272); 12,417,756 (PGR2026-00033); and 12,125,496 (IPR2026-00273).

In relation to these IPRs and PGRs, Krisp makes the following stipulations:

12,131,745 (IPR2026-00274)

If the PTAB institutes IPR2026-00274 (and does not subsequently vacate institution) based on Krisp's Petition against U.S. Patent No. 12,131,745, Krisp will not pursue in this district court litigation against the claims challenged in IPR2026-00274: (1) the specific grounds raised in IPR2026-00274; (2) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications); (3) any system prior art which is described in the prior art patents or printed publications used as ground references in IPR2026-00274; or (4) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00274.

For avoidance of doubt, Krisp reserves the right to rely on any reference raised in IPR2026-00274 for purposes other than its teachings of specific claim elements, including, but not limited to, showing the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

11,715,457 (IPR2026-00275)

If the PTAB institutes IPR2026-00275 (and does not subsequently vacate institution) based on Krisp's Petition against U.S. Patent No. 11,715,457, Krisp will not pursue in this district court litigation against the claims challenged in IPR2026-00275: (1) the specific grounds raised in IPR2026-00275; (2) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications); (3) any system prior art which is described in the prior art patents or printed publications used as ground references in IPR2026-00275; or (4) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00275.

For avoidance of doubt, Krisp reserves the right to rely on any reference raised in IPR2026-00275 for purposes other than its teachings of specific claim elements, including, but not limited to, showing the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

12,412,561 (PGR2026-00032)

If the PTAB institutes PGR2026-00032 (and does not subsequently vacate institution) based on Krisp's Petition against U.S. Patent No. 12,412,561, Krisp will not pursue in this district court litigation against the claims challenged in PGR2026-00032: (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.

For avoidance of doubt, Krisp reserves the right to rely on any reference raised in PGR2026-00032 for purposes other than its teachings of specific claim elements, including, but not limited to, showing the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

11,948,550 (IPR2026-00272)

If the PTAB institutes IPR2026-00272 (and does not subsequently vacate institution) based on Krisp's Petition against U.S. Patent No. 11,948,550, Krisp will not pursue in this district court litigation against the claims challenged in IPR2026-00272: (1) the specific grounds raised in IPR2026-00272; (2) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications); (3) any system prior art which is described in the prior art patents or printed publications used as ground references in IPR2026-00272; or (4) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00272.

For avoidance of doubt, Krisp reserves the right to rely on any reference raised in IPR2026-00272 for purposes other than its teachings of specific claim elements, including, but not limited to, showing the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

12,417,756 (PGR2026-00033)

If the PTAB institutes PGR2026-00033 (and does not subsequently vacate institution) based on Krisp's Petition against U.S. Patent No. 12,417,756, Krisp will not pursue in this district court litigation against the claims challenged in PGR2026-00033: (1) the specific grounds raised in IPGR2026-00033; or (2) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding.

For avoidance of doubt, Krisp reserves the right to rely on any reference raised in PGR2026-00033 for purposes other than its teachings of specific claim elements, including, but not limited to, showing the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

12,125,496 (IPR2026-00273)

If the PTAB institutes IPR2026-00273 (and does not subsequently vacate institution) based on Krisp's Petition against U.S. Patent No. 12,125,496, Krisp will not pursue in this district court litigation against the claims challenged in IPR2026-00273: (1) the specific grounds raised in IPR2026-00273; (2) any other grounds that could have reasonably been raised before the PTAB in that instituted proceeding (i.e., any ground that could have reasonably been raised under §§ 102 or 103 on the basis of prior art patents or printed publications); (3) any system prior art which is described in the prior art patents or printed publications used as ground references in IPR2026-00273; or (4) any ground asserting a combination of system prior art with any reference asserted as part of a ground raised in IPR2026-00273.

For avoidance of doubt, Krisp reserves the right to rely on any reference raised in IPR2026-00273 for purposes other than its teachings of specific claim elements, including, but not limited to, showing the level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms

level of ordinary skill in the art, the state of the art, evidence of patenting activity, what certain terms would mean to one with ordinary skill in the art, how one with ordinary skill in the art would have understood a prior art disclosure, and for providing motivation to combine other references.

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