
From: Nicholas Stephens
Sent: Thursday, March 19, 2026 6:21 PM
To: Michael W. Doell; Robert Rando
Cc: IPR49649-0059IP1
Subject: Petitioner Stipulation (IPR2026-00204)

Counsel,

Petitioner Tesla, Inc. (Tesla) filed a petition for *inter partes* review (IPR) with the Patent Trial and Appeal Board (PTAB) in the subject proceeding (IPR2026-00204).

Tesla hereby stipulates that, if IPR is instituted in IPR2026-00204 (“the instituted IPR”), then in *Bulletproof Property Management, LLC v. Tesla, Inc. et al.*, Case No. 1:25-cv-00665 (W.D. Tex.) (“the Texas Litigation”), Tesla 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); *Motorola Solutions, Inc. v. Stellar, LLC*, IPR2024-01205, IPR2024-01206, IPR2024-01207 & IPR2024-01208, Paper 19 (PTAB Mar. 28, 2025).

In so stipulating, Tesla 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apply to the extent IPR is instituted in this proceeding and institution is not later vacated, reversed, or otherwise withdrawn including by rehearing or Director Review.

Respectfully,
Nicholas Stephens

Counsel for Petitioner Tesla

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Hyper Ice, Inc. Ex. 1070 - Page 1
Hyper Ice, Inc. v. Therabody, Inc.
PGR2026-00051

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HYUNDAI MOTOR AMERICA INC.
Petitioner,

v.

GERM DOME INDUSTRIES LLC
Patent Owner.

Case No. PGR 2026-00030
U.S. Patent No. 12,296,061

PETITIONER'S STIPULATION

Consistent with *Sotera Wireless, Inc.*, Petitioner Hyundai Motor America Inc. (“Petitioner”) hereby stipulates that if the PTAB institutes trial in this PGR, unless institution is later vacated, reversed, or otherwise withdrawn, Petitioner and any real party in interest or privy of the Petitioner “will not pursue in [*Germ Dome Industries LLC v. Hyundai Motor America*, No: 8:25-cv-02593 (C.D. Cal.)] the specific grounds [asserted in PGR2026-00030], or . . . any other ground . . . that was raised or could have been reasonably raised in a[] [PGR]” (i.e., “any ground that could be raised under paragraph (2) or (3) of section 282(b) (relating to invalidity of the patent or any claim”)). *Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 13–14 (PTAB Dec. 1, 2020) (precedential as to § II.A) (internal quotations omitted); 35 U.S.C. § 321(b).

Dated: April 21, 2026

Respectfully submitted,

/Robert C.F. Pérez/

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Counsel for Petitioner

CERTIFICATE OF SERVICE

Pursuant to 37 C.F.R. § 42.6, I hereby certify that on April 21, 2026 the foregoing document was served via email on the following counsel of record:

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



Chris Schmidt <chris.schmidt@eriseip.com>

Apr 23, 2026 at 9:26 PM

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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 PGR2026-00033; 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

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