**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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Kubota North America Corporation,

Petitioner

v.

Vermeer Manufacturing Company,

Patent Owner

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IPR2025-00168 (U.S. Patent No. 9,321,386)

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**PETITIONER'S AUTHORIZED PAPER**

According to the Board's authorization on January 28, 2026, the Petitioner provides the following quotations and citations to Dr. Velinsky's deposition testimony taken by Patent Owner on January 6, 2026—Exhibit 2039. All citations are to EX2039, with page:line numbers.

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| **Patent Owner Counsel**: "[you] say that you have experience with these types of skid steers dating back to the early 1990s, when you were developing wheeled mobile robots for use in highway maintenance tasks…do you consider the wheeled mobile robots…you developed in the 1990s to be skid steers?" (14:14-15:1)<br>**Dr. Velinsky**: "Yes, the differentially steered wheeled mobile robots were skid steers, yes." (15:2-3) |
| **Patent Owner Counsel**: "Do you recognize this machine [Deposition Ex. B (EX2041), 11, Figure 2.2] to be the tethered mobile routing robot that your team created?" (25:4-6)<br>**Dr. Velinsky**: "the picture…was a development stage in the laboratory during the development part of the machine where we were ensuring that we could follow cracks and so on..." (26:22-27:4) |
| **Patent Owner Counsel**: "do you consider this [Deposition Ex. B (EX2041), 11, Figure 2.2] to be a compact utility loader? (28:5-6)<br>**Dr. Velinsky**: "The road-going machine definitely was. This could be considered one." (28:7-8) |

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| **Patent Owner Counsel**: "Vermeer's '386 patent…Column 1…[u]nder the heading 'Background,' there is a description of compact tool carrier…[a]pplying this definition of compact tool carrier …[to the] mobile robot [of] Exhibits A [EX2040] and B [EX2041] don't have these features, correct?" (29:2-31:4)<br>**Dr. Velinsky**: "I'm looking at this now after quite a period of time, but a self-propelled machine certainly meets that, certainly has a mass less than 1500 kilograms, certainly has a rigid frame and generally defined as such. And so my definition fits that. It's a machine that -- also our machines can operate remotely with teleoperation from someone walking on the roadway. So generally our machines do meet this definition, and in my opinion they do." (31:6-15) |
| **Patent Owner's Counsel:** So did your machine have a pedestrian operating position or a standing operator platform at the rear of the machine? (31:16-18)<br>**Dr. Velinsky**: "Our machines can be operated by a pedestrian remotely, yes. Teleoperation, that's what we're talking about. I believe in the patent it also talks about that as well, that in addition to riding on it, you can operate it, for example, wirelessly or connected with a wire it has." (31:19-32:2) |
| **Patent Owner's Counsel**: "And your tethered robots were not designed to have front-mounted interchange building equipment or lift arms with an attachment bracket capable of coupling to interchangeable front-mounted attachments, correct?" (32:7-11) |

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| **Dr. Velinsky**: "we certainly have interchangeable equipment, and the ones we're looking at don't have lift arms on them, no" (32:12-14) |
| **Patent Owner Counsel**: "And not limited to what we've looked at here [exhibits relating to AHMCT Research Center], are there any others that are closer [to machine depicted in Vermeer patent]?" (50:4-5 [49:20-22]).<br>**Dr. Velinsky**: "we looked at ones that were in laboratory testing in a laboratory. We actually have wheeled robots that worked on the roadway that were parted and were operated out in actual operations, so those would be -- I also have a mower that would -- I believe consider -- I believe is a compact utility loader as well. It was a device for -- a wheeled mobile device for mowing. …We designed the device…[t]he wheeled robot that the mower would attach to." (50:7-14). |
| **Patent Owner Counsel**: "You believe it's the same definition [of mainframe] in this declaration as it was in your very first declaration in these proceedings?" (8:20-22)<br>**Dr. Velinsky**: "Again, as best as I could recall. I haven't -- haven't read those things in a long time but yes." (9:1-3). |

Dated:____January 30, 2026____

Respectfully submitted,

HAYNES AND BOONE, LLP
2801 N. Harwood Street, Suite 2300
Dallas, Texas 75201
Customer No. 27683

/David M. O'Dell /
David M. O'Dell
Lead Counsel for Petitioner
Registration No. 42,044

## CERTIFICATE OF SERVICE

The undersigned certifies that, in accordance with 37 C.F.R. § 42.6(e), service was made on Patent Owner as detailed below.

*Date of service* _January 30, 2026___

*Manner of service* Electronic Mail: rbrophy@atllp.com
mvandertuig@atllp.com;
mvandermolen@atllp.com

*Documents served* ***PETITIONER'S AUTHORIZED PAPER***

*Persons served* Richard L. Brophy
Armstrong Teasdale LLP
7700 Forsyth Boulevard, Suite 1800
Saint Louis, Missouri 63105

Marc Vander Tuig
Armstrong Teasdale LLP
7700 Forsyth Boulevard, Suite 1800
Saint Louis, Missouri 63105

Michael J. Vander Molen
Armstrong Teasdale LLP
7700 Forsyth Boulevard, Suite 1800
Saint Louis, Missouri 63105

/ David M. O'Dell/
David M. O'Dell
Lead Counsel for Petitioner
Registration No. 42,044