

From: [Director Discretionary Decision](#)
To: [Director DI](#); [Director Discretionary Decision](#); [Daniel Kiang](#)
Cc: [Buroker, Brian M.](#); *** GDC-AvidbotsIPR - EXT; [Kieckhefer, L. Kieran](#); [ElDessouki, Ahmed](#); [Curtis, Nathan R.](#); [BoxBRAIL.002LP](#); [BoxBRAIL.002LP2](#); [BoxBRAIL.002LP3](#); [BoxBRAIL.002LP4](#); [BoxBRAIL.002LP5](#); [Daniel Hughes](#); [Sheila Swaroop](#); [Adam Powell](#)
Subject: RE: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Request for authorization for motion for protective order
Date: Monday, December 29, 2025 3:22:53 PM

Patent Owner may file the motion and include the protective order as an exhibit to the motion.

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Sent: Tuesday, December 23, 2025 2:53 PM
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Subject: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Request for authorization for motion for protective order

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Dear Honorable Board,

Patent Owner Brain Corporation requests authorization to file a motion for protective order in IPR2025-01600, -01601, -01602, -01603, -01604. Patent Owner intends to file confidential information from a related district court litigation in support of its Discretionary Denial Briefs and Patent Owner Preliminary Responses, with the first brief due January 10, 2026. Patent Owner and Petitioners Avidbots Corp. and Avidbots USA Corp. ("Petitioners") have conferred and agreed to a modified version of the Board's default protective order that: (1) adds an attorneys'-eyes-only level of confidentiality and (2) adds a provision that neither party will oppose a request to expunge confidential information after final disposition of the proceedings.

A copy of the proposed protective order has not been attached in view of the Board's general prohibition on attachments in emails to the Board. However, the parties can attach a copy of the proposed protective order and a redlined comparison against the default protective order if requested.

In view of the parties' agreement on the protective order, the parties do not believe a teleconference is necessary, but can provide their availability if requested.

Petitioners' counsel are copied on this email.

Best regards,
Daniel

Daniel Kiang

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