

Date: January 26, 2026

Filed on behalf of **Brain Corporation**

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UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

AVIDBOTS CORP. and AVIDBOTS USA CORP.,
Petitioners,

v.

BRAIN CORPORATION.,
Patent Owner

Case No. IPR2025-01600
US Patent No. 10,001,780

**PATENT OWNER'S NOTICE OF FILING OF SUPPLEMENTAL
INFORMATION AND UPDATED EXHIBIT LIST**

LIST OF EXHIBITS

Exhibit	Description
2001	Proposed Protective Order
2002	Redlined Protective Order
2003	Complaint for Patent Infringement, <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 1 (N.D. Ill. Dec. 6, 2024)
2004	Declaration of Daniel P. Hughes
2005	Northern District of Illinois Local Patent Rules
2006	Joint Initial Status Report & Notification of Docket Entry, <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkts. 40 & 42 (N.D. Ill.)
2007	Report of the Parties' Planning Meeting, <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 34 (N.D. Ill.)
2008	Defendant Avidbots's Second Supplemental Non-Infringement and Invalidity Contentions, <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)
2009	Certificate of Service of Complaint in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 8 (N.D. Ill.)
2010	HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY - Exhibit 97 to December 11, 2025 Cabrerra Deposition in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)
2011	HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY - Exhibit 99 to December 11, 2025 Cabrerra Deposition in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)
2012	HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY - Excerpts of December 11, 2025 Cabrerra Deposition in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)

2013	HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY - Exhibit 102 to December 11, 2025 Cabrerra Deposition in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)
2014	HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY - Exhibit 104 to December 11, 2025 Cabrerra Deposition in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)
2015	HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY - Excerpt of Exhibit 103 to December 11, 2025 Cabrerra Deposition in <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill.)
2016	Printout of November 16, 2019 Wayback Machine archive of https://www.braincorp.com/patents (captured on January 7, 2026)
2017	Printout of April 16, 2022 Wayback Machine archive of https://www.braincorp.com/patents (captured on January 7, 2026)
2018	HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY – Document produced by Avidbots bearing production nos. AVID0576615–AVID0576616
2019	RESERVED
2020	RESERVED
2021	RESERVED
2022	RESERVED
2023	Order Denying Motion to Stay, <i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569 (N.D. Ill. Jan. 20, 2026)

Pursuant to the Board's email authorization on January 26, 2026 and 37 C.F.R. § 42.63(e), Patent Owner Brain Corporation is filing Exhibit 2023, a copy of the district court's order denying Avidbots's motion to stay pending IPR in the co-pending litigation issued on January 20, 2026, which is relevant to *Fintiv* factor 1 in Patent Owner's Brief in Support of Discretionary Denial (Paper 8).

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. §42.6(e) and with the agreement of counsel for Petitioners, a true and correct copy of **PATENT OWNER'S NOTICE OF FILING OF SUPPLEMENTAL INFORMATION AND UPDATED EXHIBIT LIST AND EXHIBIT 2023** are being served electronically on January 26, 2026, to the e-mail addresses shown below:

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