

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  
U.S. Patent No. 10,001,780

---

**PETITIONER'S MOTION TO SEAL PETITIONER'S  
DISCRETIONARY DENIAL BRIEF AND EXHIBITS**

**PETITIONERS' EXHIBIT LIST**

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                                                                                                                     |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1001           | U.S. Patent No. 10,001,780                                                                                                                                                                                                                             |
| 1002           | File History for U.S. Patent No. 10,001,780 (Appl. No. 15/341612)                                                                                                                                                                                      |
| 1003           | Declaration of Nickolaos Papanikolopoulos                                                                                                                                                                                                              |
| 1004           | U.S. Patent Appl. Pub. No. 2015/0284010 (“Beardsley”)                                                                                                                                                                                                  |
| 1005           | J. Minguez, L. Montano, J. Santos-Victor, “Abstracting Vehicle Shape and Kinematic Constraints from Obstacle Avoidance Methods”, 20(1) Autonomous Robots 43-59 (2006) (“Minguez”)                                                                      |
| 1006           | O. Khatib, “Real-Time Obstacle Avoidance For Manipulators and Mobile Robots,” 5 Int’l J. of Robotics Research 90–98 (1986) (“Khatib”)                                                                                                                  |
| 1007           | J.A. Castellanos, J. Montiel, J. Neira, J.D Tardos, “The SPmap: A probabilistic framework for simultaneous localization and map building,” 15(5) IEEE Trans. Robotics and Automation 948–952 (1999) (“Castellanos”)                                    |
| 1008           | Declaration of Dr. Mary K. Bolin                                                                                                                                                                                                                       |
| 1009           | Maki K. Habib, “Real Time Mapping and Dynamic Navigation for Mobile Robots,” 4(3) Int’l J. of Advanced Robotic Systems 323 (2007) (“Habib”)                                                                                                            |
| 1010           | Chang, Ya-Chun, Yamamoto, Yoshio, On-line path planning strategy integrated with collision and dead-lock voidance schemes for wheeled mobile robot in indoor environments, Industrial Robot, An International Journal 35(5) 421-34 (2008) (“Yamamoto”) |
| 1011           | Oussama Khatib et al., “Robots in Human Environments: Basic Autonomous Capabilities”, 18(7) International Journal Of Robotics Research 684-696 (1999) (“Khatib ’99”)                                                                                   |
| 1012           | Choset et al., “Principles of Robotic Motion Theory, Algorithms, and Implementation”, Massachusetts Institute of Technology Press (2005) (“Choset”)                                                                                                    |
| 1013           | U.S. Patent Appl. Pub. No. 2008/0059015 (“Whittaker”)                                                                                                                                                                                                  |

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                                                                                                                |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1014           | Plaintiff Brain Corporation's Objections And Responses To Defendants' First Set Of Interrogatories (NOS. 1–9) (Redacted Excerpt)                                                                                                                  |
| 1015           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1016           | <i>15/341,612 Documents &amp; transaction history, Patent Center – USPTO (last visited Feb. 10, 2026)</i>                                                                                                                                         |
| 1017           | <i>Brain Corp. v. Avidbots Corp. et al., Case No. 1:24-cv-12569, Dkt. 126 (N.D. Ill. Jan. 21, 2026)</i>                                                                                                                                           |
| 1018           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1019           | <i>Brain Corp. v. Avidbots Corp. et al., Case No. 1:24-cv-12569, Dkt. 138 (N.D. Ill. Feb. 4, 2026)</i>                                                                                                                                            |
| 1020           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1021           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1022           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1023           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1024           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1025           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1026           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1027           | <i>Reserved</i>                                                                                                                                                                                                                                   |
| 1028           | <i>Docket Sheets Search: Courts: Illinois (all districts), Types of Document: Motion to Stay Pending Inter Partes Review, Results of Motion: Granted, DOCKETNAVIGATOR (Feb. 9, 2026)</i>                                                          |
| 1029           | <i>Docket Sheets Search: Courts: Illinois (all districts), Types of Document: Motion to Stay Pending Inter Partes Review, Results of Motion: Denied, Denied in part granted in part, Denied without prejudice, DOCKETNAVIGATOR (Feb. 9, 2026)</i> |
| 1030           | <i>Brain Corp. v. Avidbots Corp. et al., Case No. 1:24-cv-12569, Dkt. 40 (N.D. Ill. Jun. 5, 2025)</i>                                                                                                                                             |
| 1031           | <i>Time to Milestones: Courts Illinois Northern District (all districts), Case Filing Date: On or After Jan. 1st, 2008, DOCKETNAVIGATOR (Feb. 1, 2026)</i>                                                                                        |

| <b>Exhibit</b> | <b>Description</b>                                                                                                                                                                                        |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1032           | Defendant Avidbots's Final Invalidity Contentions (excerpted and redacted to remove indication that it contains HC-AEO because the excerpted version does not contain HC-AEO information) (Jan. 14, 2026) |

**I. Introduction**

On December 23, 2025, counsel for Respondent Brain Corporation (“Brain”) emailed the Patent Trial and Appeal Board (the “Board”) requesting authorization to enter an agreed Protective Order in this proceeding. Paper 7. That proposed Protective Order is based on the PTAB’s Default Protective Order, and further includes (1) a HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY (“HC-AEO”) designation, and (2) a provision that neither party will oppose a request to expunge confidential information after final disposition of the proceedings. *See* Paper 7, at 2. On December 29, 2025, counsel for Brain submitted a Motion for Entry of a Protective Order, and on January 12, 2026, submitted a Motion to Seal its Discretionary Denial Brief and Exhibits. Paper 10. Avidbots supports Brain’s Motions for Entry of a Protective Order and to Seal its Discretionary Denial Brief and Exhibits.

Petitioners Avidbots Corp. and Avidbots USA Corp. (Avidbots) further move to seal their Brief Opposing Discretionary Denial, which refers to Avidbots’s confidential information that Brain filed under seal. Those documents include Ex2010 and Ex2014, which relate to Avidbots’s competitive market intelligence activities. These documents are relevant to discretionary denial, including at least to Settled Expectations.

## **II. Good Cause Supports Petitioner's Motions for Entry of a Protective Order and to Seal**

Good cause supports entry of the Proposed Stipulated Protective Order and further supports filing Petitioner's Brief Opposing Discretionary Denial, and associated Exhibits, under seal. The materials that Petitioner anticipates sealing contain confidential business information that was produced by Petitioner and designated as HC-ACEO in the co-pending district court litigation between the parties, styled *Brain Corp. v. Avidbots Corp.*, Case No. 1:24-cv-12569 (N.D. Ill.) (the "Litigation").

Good cause exists for the sealing of the Exhibits that Patent Owner submitted under seal, including Exhibits 2010 and 2014 and references to this document in the Petitioner's Response to Patent Owner's Request for Discretionary Denial, for the reasons expressed by Patent Owner (Paper 10). Exhibits 2010 and 2014 were designated by Petitioner under the district court's protective order as containing HC-AEO, and contains confidential business information relating to Avidbots's competitive intelligence activities.

## **III. Certification of Non-Publication**

Undersigned counsel, on behalf of Petitioner, certifies that the information sought to be sealed has not, to their knowledge, been published or otherwise made public by Patent Owner.

#### **IV. Certification of Conference**

Petitioner certifies that it has conferred with counsel for Patent Owner. Counsel for Patent Owner has stated that it agrees to the Proposed Stipulated Protective Order pending approval by the Board and agrees to the sealing of the information parties designated as HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY.

#### **V. Conclusion**

For the foregoing reasons, Patent Owner respectfully requests that the Board enter the Proposed Protective Order, as filed by Patent Owner as Exhibit 2001, seal the documents identified as Exhibits 2010 and 2014 (as well as the other documents that Patent Owner requested be sealed), and seal the portions of Petitioner's Response to Patent Owner's Request for Discretionary Denial that reference the sealed exhibits.

DATED: February 10, 2026

Respectfully Submitted,

/Brian M. Buroker/

Brian M. Buroker (Reg. No. 39,125)  
GIBSON, DUNN & CRUTCHER LLP  
1700 M Street, NW  
Washington, DC 20036  
Phone: (202) 955-8500  
Fax: (202) 467-0539  
Email: [bburoker@gibsondunn.com](mailto:bburoker@gibsondunn.com)

*Attorney for Petitioners*  
*Avidbots Corp. and Avidbots USA Corp.*

## **CERTIFICATE OF SERVICE**

The undersigned certifies service pursuant to 37 C.F.R. §§ 42.6(e) and 42.105(a), (b) on the Patent Owner of the UNOPPOSED MOTION TO SEAL AND FOR ENTRY OF A PROTECTIVE ORDER via email to the following addresses of record:

Daniel P. Hughes  
[2DPH@knobbe.com](mailto:2DPH@knobbe.com)  
Adam Powell  
[2ABP@knobbe.com](mailto:2ABP@knobbe.com)  
Sheila N. Swaroop  
[2SNS@knobbe.com](mailto:2SNS@knobbe.com)  
Daniel C. Kiang  
[2DCK@knobbe.com](mailto:2DCK@knobbe.com)

DATED: February 10, 2026

By: /Brian M. Buroker/

Brian M. Buroker (Reg. No. 39,125)  
GIBSON, DUNN & CRUTCHER LLP  
1700 M Street, NW  
Washington, DC 20036  
Phone: (202) 955-8500  
Fax: (202) 467-0539  
Email: [bburoker@gibsondunn.com](mailto:bburoker@gibsondunn.com)

*Attorney for Petitioners*  
*Avidbots Corp. and Avidbots USA Corp.*