

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. IPR2025-01601
U.S. Patent No. 10,379,539

SEARCH DISCLOSURE DECLARATION

Mail Stop PATENT BOARD
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

The Petition for Inter Partes Review cites five references in its grounds:

1. U.S. Patent Appl. Pub. No. 2015/0284010 (“Beardsley”) (Ex1004)
2. O. Khatib, “Real-Time Obstacle Avoidance For Manipulators and Mobile Robots,” 5 Int’l J. of Robotics Research 90–98 (1986) (“Khatib”) (Ex1006)
3. 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”) (Ex1007)
4. 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”) (Ex1010).
5. J. Scholz, S. Chitta, B. Marthi and M. Likhachev, “Cart pushing with a mobile manipulation system: Towards navigation with moveable objects,” IEEE International Conference on Robotics and Automation 6115-6120 (2011) (Ex1015).

Collectively, those five references are the asserted prior art.

Per the November 17, 2025 memorandum, Petition provides the information for where the asserted prior art was located:

Database and repositories in which the asserted prior art was located: The asserted prior art was located using Google Scholar, Google Patents, and Google Search.

General search approach, search terms, filters, queries or classification pathways employed for the asserted prior art: One search looked for patents and patent applications including keywords including “map,” “navigation,” “footprint,” and “forces.” Other searches employed keyword searching with terms like “robot” and “autonomous navigation”.

Other analytics or publicly accessible resources consulted for the asserted prior art: None

The amount of time spent on the search for the asserted prior art: Six to eight hours were spent.

The amount of time spent reviewing search results for the asserted prior art: Two to three hours were spent reviewing the search results.

DATED: December 1, 2025

Respectfully Submitted,

/Brian M. Buroker/

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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 via FedEx overnight mail of a complete copy of Petitioner's Search Disclosure Declaration at the correspondence address of record for the '539 Patent:

197519 - Pierson Ferdinand, LLP
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A courtesy copy was also sent via electronic mail to Patent Owner's litigation counsel at the following addresses:

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