

Date: December 22, 2025

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. IPR2025-01601
US Patent No. 10,379,539

PATENT OWNER'S MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(3), Patent Owner Brain Corporation hereby submits the following Mandatory Notices in response to the Petition for *Inter Partes Review* of U.S. Patent No. 10,379,539.

1. Real Party-In-Interest under 37 CFR § 42.8(b)(1)

Brain Corporation is the Patent Owner and the Real Party-In-Interest in this proceeding.

2. Related Matters under 37 CFR § 42.8(b)(2)

U.S. Patent No 10,379,539 is currently involved in *Brain Corporation v. Avidbots Corp. and Avibots USA Corp.*, U.S. District Court for the Northern District of Illinois, Case No. 1:24-cv-12569.

Patent Owner is not aware of any other judicial or administrative matter involving the ‘539 Patent that would affect, or be affected, by a decision in the requested IPR.

3. Lead and Back-Up Counsel, under 37 CFR § 42.8(b)(3)

The Patent Owner designates the following lead and back-up counsel:

Lead Counsel	Backup Counsel
Daniel P. Hughes (Reg. No. 76,592) Email: 2DPH@knobbe.com Knobbe, Martens, Olson & Bear, LLP <u>Postal and Hand-Delivery Address:</u> 3579 Valley Centre Drive, Suite 300 San Diego, CA 92130 Tel: (858) 707-4000	Adam B. Powell (Reg. No. 70,367) Email: 2ABP@knobbe.com Knobbe, Martens, Olson & Bear, LLP <u>Postal and Hand-Delivery Address:</u> 3579 Valley Centre Drive, Suite 300 San Diego, CA 92130 Tel: (858) 707-4000

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Pursuant to 37 C.F.R. § 42.10(b), a Power of Attorney accompanies these
Mandatory Notices.

4. Service Information under 37 CFR § 42.8(b)(4)(i) *et seq.*

Please address all correspondence and service to counsel as listed above.
Patent Owner consents to service by email at BoxBRAIL.002LP3@knobbe.com.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 22, 2025

/Daniel P. Hughes/
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Avidbots Corp., et al. v. Brain Corporation
IPR2025-01601

Attorney for Patent Owner,
Brain Corporation

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to 37 C.F.R. § 42.6(e) and with the agreement of counsel for Petitioner, a true and correct copy of **PATENT OWNER'S MANDATORY NOTICES** is being served electronically on December 22, 2025, to the e-mail addresses shown below:

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