

From: [Director Discretionary Decision](#)
To: [Buroker, Brian M.](#); [Director Discretionary Decision](#); [Daniel Kiang](#); [Director DI](#); [Trials](#)
Cc: *** [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 | Protective order
Date: Tuesday, February 10, 2026 11:59:36 AM

Petitioner may file its upcoming discretionary denial opposition brief under seal with an accompanying motion to seal while the unopposed motion for protective order is pending.

From: Buroker, Brian M. <BBuroker@gibsondunn.com>
Sent: Monday, February 9, 2026 4:28 PM
To: [Director Discretionary Decision](#) <[Director Discretionary Decision@uspto.gov](#)>; [Daniel Kiang](#) <[Daniel.Kiang@knobbe.com](#)>; [Director DI](#) <[Director_DI@uspto.gov](#)>; [Trials](#) <[Trials@USPTO.GOV](#)>
Cc: *** [GDC-AvidbotsIPR - EXT](#) <[GDC-AvidbotsIPR@gibsondunn.com](#)>; [Kieckhefer, L. Kieran](#) <[KKieckhefer@gibsondunn.com](#)>; [ElDessouki, Ahmed](#) <[AElDessouki@gibsondunn.com](#)>; [Curtis, Nathan R.](#) <[NCurtis@gibsondunn.com](#)>; [BoxBRAIL.002LP](#) <[BoxBRAIL.002LP@knobbe.com](#)>; [BoxBRAIL.002LP2](#) <[BoxBRAIL.002LP2@knobbe.com](#)>; [BoxBRAIL.002LP3](#) <[BoxBRAIL.002LP3@knobbe.com](#)>; [BoxBRAIL.002LP4](#) <[BoxBRAIL.002LP4@knobbe.com](#)>; [BoxBRAIL.002LP5](#) <[BoxBRAIL.002LP5@knobbe.com](#)>; [Daniel Hughes](#) <[Daniel.Hughes@knobbe.com](#)>; [Sheila Swaroop](#) <[Sheila.Swaroop@knobbe.com](#)>; [Adam Powell](#) <[Adam.Powell@knobbe.com](#)>
Subject: Re: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Protective order

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To the Board:

Petitioner's Opposition on Discretionary Denial is due tomorrow. Petitioner understands that it is also authorized to file its discretionary denial brief under seal with an accompanying motion to seal while the unopposed motion for protective order is pending. If that is not correct, we seek authorization to do so for the same reasons Patent Owner sought to file its discretionary denial brief.

Thanks,
Brian
Counsel for Petitioner

Brian M. Buroker

[Partner](#)

T: +1 202.955.8541 | M: +1 703.927.2129
[bburoker@gibsondunn.com](#)

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1700 M St., N.W., Washington DC 20036-4504

From: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Date: Friday, January 9, 2026 at 8:28 AM
To: Daniel Kiang <Daniel.Kiang@knobbe.com>, Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>, Director_DI <Director_DI@uspto.gov>, "Trials@uspto.gov" <Trials@USPTO.GOV>
Cc: Brian Buroker <BBuroker@gibsondunn.com>, *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>, "L. Kieran Kieckhefer" <KKieckhefer@gibsondunn.com>, Ahmed ElDessouki <AEIDessouki@gibsondunn.com>, Nathan Curtis <NCurtis@gibsondunn.com>, "BoxBRAIL.002LP" <BoxBRAIL.002LP@knobbe.com>, "BoxBRAIL.002LP2" <BoxBRAIL.002LP2@knobbe.com>, "BoxBRAIL.002LP3" <BoxBRAIL.002LP3@knobbe.com>, "BoxBRAIL.002LP4" <BoxBRAIL.002LP4@knobbe.com>, "BoxBRAIL.002LP5" <BoxBRAIL.002LP5@knobbe.com>, Daniel Hughes <Daniel.Hughes@knobbe.com>, Sheila Swaroop <Sheila.Swaroop@knobbe.com>, Adam Powell <Adam.Powell@knobbe.com>
Subject: RE: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Protective order

Patent Owner may file its upcoming discretionary denial brief under seal with an accompanying motion to seal while the unopposed motion for protective order is pending.

From: Daniel Kiang <Daniel.Kiang@knobbe.com>
Sent: Thursday, January 8, 2026 1:58 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>; Director_DI <Director_DI@uspto.gov>; Trials <Trials@USPTO.GOV>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>; *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; BoxBRAIL.002LP <BoxBRAIL.002LP@knobbe.com>; BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>; BoxBRAIL.002LP3 <BoxBRAIL.002LP3@knobbe.com>; BoxBRAIL.002LP4 <BoxBRAIL.002LP4@knobbe.com>; BoxBRAIL.002LP5 <BoxBRAIL.002LP5@knobbe.com>; Daniel Hughes <Daniel.Hughes@knobbe.com>; Sheila Swaroop <Sheila.Swaroop@knobbe.com>; Adam Powell <Adam.Powell@knobbe.com>
Subject: Re: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Protective order

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Dear Honorable Board,

Pursuant to the Board's email below, Patent Owner Brain Corporation filed an unopposed motion for protective order in IPR2025-01600 through -1604 on December 29, 2025. Patent Owner's first discretionary denial brief is due this coming Monday, January 12, in IPR2025-01600 (original deadline falling on Saturday, January 10). In the upcoming brief, Patent Owner intends to rely upon Petitioner's confidential information in support of Patent Owner's "settled expectations" arguments. Because of the imminent deadline and the fact that the parties have agreed to the terms of the proposed protective order (see December 23 email below), Patent Owner respectfully requests that the Board grant the unopposed motion

for protective order before January 12, 2026.

Alternatively, could the Board please confirm that Patent Owner may file its upcoming discretionary denial brief under seal with an accompanying motion to seal while the unopposed motion for protective order is pending?

Petitioner's counsel is copied on this email.

Best regards,
Daniel

Daniel Kiang
Partner
949-721-5205 Direct
Knobbe Martens

From: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Date: Monday, December 29, 2025 at 12:23 PM
To: Director_DI <Director_DI@uspto.gov>, Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>, Daniel Kiang <Daniel.Kiang@knobbe.com>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>, *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>, Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>, ElDessouki, Ahmed <AElDessouki@gibsondunn.com>, Curtis, Nathan R. <NCurtis@gibsondunn.com>, BoxBRAIL.002LP <BoxBRAIL.002LP@knobbe.com>, BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>, BoxBRAIL.002LP3 <BoxBRAIL.002LP3@knobbe.com>, BoxBRAIL.002LP4 <BoxBRAIL.002LP4@knobbe.com>, BoxBRAIL.002LP5 <BoxBRAIL.002LP5@knobbe.com>, Daniel Hughes <Daniel.Hughes@knobbe.com>, Sheila Swaroop <Sheila.Swaroop@knobbe.com>, Adam Powell <Adam.Powell@knobbe.com>
Subject: RE: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Request for authorization for motion for protective order

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

From: Daniel Kiang <Daniel.Kiang@knobbe.com>
Sent: Tuesday, December 23, 2025 2:53 PM
To: Trials <Trials@USPTO.GOV>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>; *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>

AvidbotsIPR@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; ElDessouki, Ahmed <AEIDessouki@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; BoxBRAIL.002LP <BoxBRAIL.002LP@knobbe.com>; BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>; BoxBRAIL.002LP3 <BoxBRAIL.002LP3@knobbe.com>; BoxBRAIL.002LP4 <BoxBRAIL.002LP4@knobbe.com>; BoxBRAIL.002LP5 <BoxBRAIL.002LP5@knobbe.com>; Daniel Hughes <Daniel.Hughes@knobbe.com>; Sheila Swaroop <Sheila.Swaroop@knobbe.com>; Adam Powell <Adam.Powell@knobbe.com>

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
Partner
Daniel.Kiang@knobbe.com
(949) 760-0404 Main

Knobbe Martens

2040 Main St., 14th Fl.

Irvine, CA 92614

www.knobbe.com/daniel-kiang

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