

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

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

PETITIONERS' EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 10,379,539
1002	File History for U.S. Patent No. 10,379,539 (Appl. No. 16/011,499)
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	International Organization for Standardization, "Robots and robotic devices — Safety requirements for personal care robots" 13482 First Edition (2014)

Exhibit	Description
1014	Plaintiff Brain Corporation's Objections And Responses To Defendants' First Set Of Interrogatories (NOS. 1–9) (Redacted Excerpt)
1015	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)
1016	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0004188) (sealed)
1017	<i>14/208,709 Documents & transaction history</i> , Patent Center – USPTO (last visited Mar. 2, 2026)
1018	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 126 (N.D. Ill. Jan. 21, 2026)
1019	Plaintiff Brain Corporation's First Supplemental Objections and Response to Defendants' Third Set of Interrogatories (No. 20) (redacted) (Nov. 21, 2025) (sealed)
1020	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 138 (N.D. Ill. Feb. 4, 2026)
1021	<i>Janitorial Equipment and Supplies</i> , Freedonia (BRAIN_0228245) (sealed)
1022	Brain Email (BRAIN_0228244) (sealed)
1023	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0003580) (sealed)
1024	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0316136) (sealed)
1025	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0003708) (sealed)
1026	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 145 (N.D. Ill. Feb. 17, 2026)
1027	Board Meeting (BRAIN_0389368) (sealed)
1028	Brain Email (BRAIN_0013142) (sealed)

Exhibit	Description
1029	<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>
1030	<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>
1031	<i>Brain Corp. v. Avidbots Corp. et al., Case No. 1:24-cv-12569, Dkt. 40 (N.D. Ill. Jun. 5, 2025)</i>
1032	<i>Time to Milestones: Courts Illinois Northern District (all districts), Case Filing Date: On or After Jan. 1st, 2008, DOCKETNAVIGATOR (Feb. 1, 2026)</i>
1033	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)
1034	Appl. No. 15/340,807, "Notification of loss of small entity status" (Feb. 25, 2026)
1035	Appl. No. 15/341,612, "Notification of loss of small entity status" (Feb. 25, 2026)
1036	Appl. No. 15/845,891, "Notification of loss of small entity status" (Feb. 25, 2026)
1037	Appl. No. 16/011,499, "Notification of loss of small entity status" (Feb. 25, 2026)
1038	Appl. No. 16/356,160, "Notification of loss of small entity status" (Feb. 25, 2026)
1039	Avidbots's List of Proposed Claim Terms for Construction (Feb. 25, 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. The Office entered the Protective Order on February 23, 2026. Paper 11.

Pursuant to the entered Protective Order, Petitioners Avidbots Corp. and Avidbots USA Corp. (Avidbots) further move to seal their Brief Opposing Discretionary Denial, as well as several exhibits to that Brief. Those documents include several documents produced by Brain in the Litigation which Brain has designated as HC-AEO, including: (1) an interrogatory response submitted by Brain; (2) agreements between Brain and its manufacturing partners; and (3) Brain internal documents reflecting the knowledge of its senior officers and inventors regarding

Brain's agreements. These documents are relevant to discretionary denial, including at least to Settled Expectations and to Other Considerations under *Fintiv*.

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 Patent Owner 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"), as well as technical information relating to Avidbots's products.

Good cause exists for the sealing of Brain's interrogatory response (Exhibit 1019), and references to this document in the Petitioner's Response to Patent Owner's Request for Discretionary Denial. This document was designated by Brain under the district court's protective order as containing HC-AEO, and contains confidential business information relating to Brain's licenses and market strategy.

Good cause also exists for the sealing of agreements between Brain and its manufacturing partners (Exhibits 1016, 1023–25), and references to these documents in the Petitioner's Response to Patent Owner's Request for Discretionary Denial. These documents are confidential agreements between Brain and its manufacturing partners, the terms of which are not publicly known.

Good cause also exists for the sealing of Brain's internal documents reflecting the knowledge of its senior officers and inventors regarding Brain's agreements (Exhibits 1021–22, 1027–28), and references to these documents in the Petitioner's Response to Patent Owner's Request for Discretionary Denial. These documents were designated as HC-AEO by Brain under the district court's protective order, and contain confidential business information relating to Brain's licenses and market strategy.

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 1016, 1019, 1021–25, and 1027–28, and seal

the portions of Petitioner's Response to Patent Owner's Request for Discretionary Denial that reference the sealed exhibits.

DATED: March 4, 2026

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 of the UNOPPOSED MOTION TO SEAL AND FOR ENTRY OF A PROTECTIVE ORDER via email to the following addresses of record:

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DATED: March 4, 2026

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