IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

BRAIN CORPORATION, Plaintiff, v. AVIDBOTS CORP., AVIDBOTS USA CORP., Defendants.	CASE NO. 1:24-cv-12569 JURY TRIAL DEMANDED

AVIDBOTS'S LIST OF PROPOSED CLAIM TERMS FOR CONSTRUCTION

Pursuant to L.P.R. 4.1, Defendants Avidbots Corp. and Avidbots USA Corp. (together "Avidbots") hereby identify claim terms, phrases, or clauses for construction and propose constructions for each identified claim term, phrase or clause:

Avidbots's Proposed Terms and Constructions		
Phrase	**Claim(s)**	**Avidbots' Proposed Construction**
"A robot comprising:"	'780 patent claim 8	The preamble is limiting
"A non-transitory computer-readable storage apparatus having a plurality of instructions stored thereon, the instructions being executable by a processing apparatus to operate a robot, the instructions configured to, when executed by the processing apparatus, cause the processing apparatus to:"	'780 patent claim 18	The preamble is limiting
"A robot for maneuvering along a route, comprising:"	'539 patent clms. 1, 3–4, 6	The preamble is limiting
"A method of generating a map by a robot, comprising:"	'325 patent clms. 1, 5	The preamble is limiting
"A robot, comprising:"	'325 patent claim 14	The preamble is limiting

"A system for traveling a robot along a route, comprising:"	'576 patent claim 12	The preamble is limiting
"graph"	'325 patent clms. 1, 5, 14	"a data structure comprising nodes connectable by one or more edges"
"node"	'325 patent clms. 1, 5, 14 '576 patent clms. 12, 17, 21–23	"a vertex (also called a point) of a graph"
"range"	'325 patent clms. 1, 5 '576 patent clms. 12, 17, 21–23	"an area wherein the actual location of the robot can be within that area"
"home locator"	'325 patent claim 5 '576 patent claim 17	"a physical indicator"

Avidbots reserves the right to add or remove claim terms from those proposed for construction, and to amend or supplement these proposed constructions including in response to Brain Corporation's ("Brain's") proposed constructions, as a result of the meet and confer process with Brain, and/or as discovery continues. By proposing a construction for a claim term, or failing to propose a construction for a claim term, phrase, or clause, Avidbots in no way admits that construction is required, not required, or possible.

The claim numbers identified above are representative. Unless otherwise indicated, identification of a proposed construction also applies to the instances of that term, phrase, or clause in any of the asserted claims that are dependent on the claims identified. Avidbots reserves the right to seek construction of a smaller component of the term, phrase, or clause proposed for claim

construction, and the right to seek construction of terms, phrases, or clauses that includes the term, phrase, or clause proposed for claim construction including for context.

With respect to the patents asserted by Avidbots against Brain (U.S. Patent Nos. 10,206,550, 10,667,664, 11,510,545, 11,531,347, and 11,844,474), Avidbots does not submit any claim terms, phrases, or clauses for construction at this time but reserves the right to add claim terms for construction, and to propose constructions in response to any term that Brain may identify, as a result of the meet and confer process with Brain, and/or as discovery continues.

Dated: February 25, 2026

Respectfully submitted,

AVIDBOTS CORP., a Canadian Corporation; and AVIDBOTS USA CORP., a Delaware Corporation,

/s/ Ahmed ElDessouki

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served electronically on February 25, 2026 on all counsel who have consented to electronic service.

/s/ Ahmed E. ElDessouki
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