

From: [Trials](#)
To: [Daniel Kiang](#); [Sheila Swaroop](#); [Buroker, Brian M.](#); [ElDessouki, Ahmed](#); [Kieckhefer, L. Kieran](#); [*** GDC-AvidbotsIPR - EXT](#); [BoxBRAIL.002LP2](#); [Daniel Hughes](#); [Adam Powell](#)
Cc: [Trials](#)
Subject: RE: IPR2025-01601, -1602, -1603, -1604 | Request for authorization for motions to expunge
Date: Thursday, April 16, 2026 12:00:02 PM
Attachments: [image001.png](#)

Counsel,

Patent Owner is authorized to file motions to expunge papers and exhibits in IPR2025-01601, IPR2025-01602, IPR2025-01603, and IPR2025-01604.

If Patent Owner also wishes to file a motion to expunge papers and exhibits in the similarly-situated IPR2025-01600, Patent Owner is authorized to do so.

Regards,

Andrew Kellogg,
Deputy Chief Clerk, Trials
Patent Trial and Appeal Board
USPTO
andrew.kellogg@uspto.gov
(571) 272-5366

IPR2025-01601
IPR2025-01602
IPR2025-01603
IPR2025-01604
Ex. 3001



From: Daniel Kiang <Daniel.Kiang@knobbe.com>
Sent: Friday, April 10, 2026 3:20 PM
To: Trials <Trials@USPTO.GOV>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>; ElDessouki, Ahmed <AElDessouki@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>; BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>; Daniel Hughes <Daniel.Hughes@knobbe.com>; Sheila Swaroop <Sheila.Swaroop@knobbe.com>; Adam Powell <Adam.Powell@knobbe.com>
Subject: IPR2025-01601, -1602, -1603, -1604 | Request for authorization for motions to expunge

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Dear Honorable Board,

Patent Owner Brain Corporation respectfully requests authorization to file motions to expunge papers and exhibits in IPR2025-01601 through -01604 that contain Patent Owner's confidential information. Each of these IPRs were discretionarily denied and the Board has already approved Petitioner's refund requests in each IPR.

Patent Owner already conferred with Petitioner when negotiating the protective order entered in each of these IPRs and memorialized their agreement not to oppose either party's motions to expunge in Section 8 of the entered protective orders. See Ex. 2001 at §8 in each IPR. Accordingly, Patent Owner's motions to expunge will be unopposed.

If the Board requests a conference call, the parties can provide their availability.

Petitioner's counsel is copied on this email.

Best regards,
Daniel

Daniel Kiang

Partner

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