

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. IPR2025-01602
U.S. Patent No. 10,275,325

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

PETITIONERS' EXHIBIT LIST

Exhibit	Description
1001	U.S. Patent No. 10,274,325
1002	File History for U.S. Patent No. 10,274,325 (Appl. No. 15/340,807)
1003	Declaration of Dr. Karam
1004	Edwin B. Olson, et al, Robust and Efficient Robotic Mapping, Massachusetts Institute of Technology, June 2008. ("Olson")
1005	Stachniss et al., <i>Springer Handbook of Robotics, Chapter 46: Simultaneous Localization and Mapping</i> , (Bruno Siciliano and Oussama Khatib eds., Springer 2d ed., 2016). ("Stachniss")
1006	U.S. Patent No. 9,538,892 ("Fong")
1007	U.S. Patent No. 9,020,637 ("Schnittman")
1008	Declaration of Dr. Mary K. Bolin
1009	Smith, Randall C., and Cheeseman, Peter. "On the representation and estimation of spatial uncertainty." <i>The International Journal of Robotics Research</i> 5.4 (1986): 56-58.
1010	Chatila, Raja, and Laumond, J. "Position referencing and consistent world modeling for mobile robots." <i>Proceedings of the 1985 IEEE International Conference on Robotics and Automation</i> . (1985): 138-45. Vol. 2. IEEE, 1985.
1011	Durrant-Whyte, Hugh, and Bailey, Tim. "Simultaneous localization and mapping: part I." <i>IEEE robotics & Automation</i> (1985): 138-45. Vol. 2. IEEE, 1985.
1012	Davison, Andrew J., and Murray, David W. "Mobile robot localization using active vision." <i>Proceedings of the 5th European Conference on Computer Vision</i> . Berlin, Heidelberg: Springer Berlin Heidelberg, (1998):809-825
1013	Lu, Feng, and Milios, Evangelos. "Globally consistent range scan alignment for environment mapping." <i>Autonomous robots</i> 4 (1997): 333-349
1014	Grisetti, Giorgio, et al. "A tutorial on graph-based SLAM." <i>IEEE Intelligent Transportation Systems Magazine</i> 2.4 (2011): 31-43.

Exhibit	Description
1015	Henry, Peter, et al. “RGB-D mapping: Using Kinect-style depth cameras for dense 3D modeling of indoor environments.” <i>The International Journal of Robotics Research</i> 31.5 (2012): 647-663.
1016	<i>Springer Handbook of Robotics</i> , (Bruno Siciliano and Oussama Khatibs eds., Springer 2d ed., 2016).
1017	Macenski, Steve, and Jambrecic, Ivona. “SLAM Toolbox: SLAM for the dynamic world.” <i>Journal of Open Source Software</i> 6.61 (2021): 2783.
1018	Grisetti, Giorgio, Stachniss, Cyrill, and Burgard, Wolfram, <i>gmapping</i> , OpenSlam.org, https://openslamorg.github.io/gmapping.html (last visited Oct. 16, 2025).
1019	Grisetti, Giorgio, Stachniss, Cyrill, and Burgard, Wolfram. “Improving Grid-based SLAM with Rao-Blackwellized Particle Filters by Adaptive Proposals and Selective Resampling,” <i>Proceedings of the 2005 IEEE International Conference on Robotics and Automation (ICRA)</i> . (2005)2432-37.
1020	Grisetti, Giorgio, Stachniss, Cyrill, and Burgard, Wolfram. “Improved Techniques for Grid Mapping with Rao-Blackwellized Particulate Filters.” <i>IEEE Transactions on Robotics</i> , 23.1 (2007):34-36.
1021	Tully Foote, <i>Community Metrics Report: July 2015</i> , ROS.org http://download.ros.org/downloads/metrics/metrics-report-2015-07.pdf (last visited Oct. 16, 2025).
1022	Plaintiff Brain Corporaiton’s [sic] Objections and Responses to Defendant’s First Set of Interrogatories (Nos. 1-9) (Redacted Excerpt)
1023	Gutmann, J-S., and Kurt Konolige. “Incremental mapping of large cyclic environments.” <i>Proceedings of the 1999 IEEE International Symposium on Computational Intelligence in Robotics and Automation. (CIRA)</i> . (1999):318-325.
1024	Dr. Lina J. Karam, <i>Curriculum Vitae</i> .
1025	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0004188) (sealed)

Exhibit	Description
1026	<i>14/208,709 Documents & transaction history, Patent Center – USPTO (last visited Mar. 2, 2026)</i>
1027	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 126 (N.D. Ill. Jan. 21, 2026)
1028	Plaintiff Brain Corporation's First Supplemental Objections and Response to Defendants' Third Set of Interrogatories (No. 20) (redacted) (Nov. 21, 2025) (sealed)
1029	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 138 (N.D. Ill. Feb. 4, 2026)
1030	<i>Janitorial Equipment and Supplies</i> , Freedonia (BRAIN_0228245) (sealed)
1031	Brain Email (BRAIN_0228244) (sealed)
1032	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0003580) (sealed)
1033	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0316136) (sealed)
1034	<i>Joint Development and License Agreement</i> , Brain Corp and Third-Party OEM (BRAIN_0003708) (sealed)
1035	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 145 (N.D. Ill. Feb. 17, 2026)
1036	Board Meeting (BRAIN_0389368) (sealed)
1037	Brain Email (BRAIN_0013142) (sealed)
1038	<i>Docket Sheets Search: Courts: Illinois (all districts), Types of Document: Motion to Stay Pending Inter Partes Review, Results of Motion: Granted</i> , DOCKETNAVIGATOR (Feb. 9, 2026)
1039	<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</i> , DOCKETNAVIGATOR (Feb. 9, 2026)
1040	<i>Brain Corp. v. Avidbots Corp. et al.</i> , Case No. 1:24-cv-12569, Dkt. 40 (N.D. Ill. Jun. 5, 2025)

Exhibit	Description
1041	<i>Time to Milestones: Courts Illinois Northern District (all districts), Case Filing Date: On or After Jan. 1st, 2008, DOCKETNAVIGATOR</i> (Feb. 1, 2026)
1042	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)
1043	Appl. No. 15/340,807, "Notification of loss of small entity status" (Feb. 25, 2026)
1044	Appl. No. 15/341,612, "Notification of loss of small entity status" (Feb. 25, 2026)
1045	Appl. No. 15/845,891, "Notification of loss of small entity status" (Feb. 25, 2026)
1046	Appl. No. 16/011,499, "Notification of loss of small entity status" (Feb. 25, 2026)
1047	Appl. No. 16/356,160, "Notification of loss of small entity status" (Feb. 25, 2026)
1048	Avidbots's List of Proposed Claim Terms for Construction (Feb. 25, 2026)
1049	Brain'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 February 11, 2026, submitted a Motion to Seal its Discretionary Denial Brief and Exhibits. The Office entered the Proposed 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 supported 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 1028), 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 10, 1032–34), 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 1030–31, 1036–37), 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 agreed to the Proposed Stipulated Protective Order that was entered 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 1025, 1028, 1030–34, and 1036–37, and seal

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

DATED: March 11, 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 11, 2026

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