Date: December 29, 2025

Filed on behalf of **Brain Corporation**
By: Daniel P. Hughes (Reg. No. 76,592)
Adam Powell (Reg. No. 70,367)
Sheila Swaroop (Reg. No. 53,658)
Daniel C. Kiang (Reg. No. 79,631)
KNOBBE, MARTENS, OLSON & BEAR, LLP
3579 Valley Centre Drive, Suite 300
San Deigo, CA 92130
Tel.: (858) 707-4000
Fax: (858) 707-4001
E-mail: BoxBRAIL.002LP2@knobbe.com

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. IPR2025-01603
US Patent No. 10,823,576

PATENT OWNER'S MOTION FOR PROTECTIVE ORDER

LIST OF EXHIBITS

Exhibit No.	Description
2001	Proposed Protective Order
2002	Redlined Protective Order

Pursuant to 37 C.F.R. § 42.54 and the Board's authorization on December 29, 2025, Patent Owner Brain Corporation hereby moves for entry of the proposed protective order attached hereto as EX2001. A redlined version of the proposed protective order showing the changes compared to the Board's default protective order is attached hereto as EX2002. Patent Owner hereby certifies that it has conferred with Petitioners Avidbots Corp. and Avidbots USA Corp. ("Petitioners") and Petitioners have agreed to the terms of the proposed protective order.

I. GOOD CAUSE EXISTS FOR ENTRY OF A PROTECTIVE ORDER

Good cause exists for entry of the proposed protective order because Patent Owner intends to submit with its Discretionary Denial Brief and Preliminary Response documents produced by Petitioner in the related civil action, *Brain Corp. v. Avidbots Corp. et al.*, No. 24-cv-12569 (N.D. Ill.). The documents are relevant at least to the settled expectations between the parties and objective indicia of nonobviousness. But Petitioner designated them as confidential and/or highly confidential in the related civil action. Petitioner has not consented to de-designate the documents. Thus, a protective order is necessary to present the evidence to the Board. Petitioner may also submit its own confidential or highly confidential internal engineering documents that are also relevant at least to objective indicia of nonobviousness.

Further, good cause exists to enter the proposed protective order because the parties have agreed on its terms and the modifications to the default protective order are consistent with the integrity and efficient administration of this proceeding. *See* Trial Practice Guide, Appendix B, Section (j) ("The Board will consider changes agreed to by the parties, and generally will accept such proposed changes if they are consistent with the integrity and efficient administration of the proceedings.").

The proposed protective order differs from the Board's default protective order in two ways: (1) the addition of a HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY level of confidentiality (Sections 2-3), and (2) the addition of a provision that neither party will oppose a request to expunge confidential information after final disposition of the proceedings (Section 8). *See* Exhibit B. The Trial Practice Guide provides that the "Board will presumptively accept agreed-to changes that provide additional categories of confidentiality as long as they are reasonable and adequately define what types of materials are to be included in the additional categories." Trial Practice Guide, Appendix B, Section (j). Here, the proposed protective order is reasonable and defines the types of information to be included within the HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY category. *See* EX2002 at Sections 2-3. Further, the parties' agreement not to oppose future requests to expunge confidential information after final disposition is a streamlining provision.

Accordingly, Patent Owner respectfully requests entry of the proposed protective order attached as EX2001.

Respectfully submitted,

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 29, 2025

/Daniel P. Hughes/
Daniel P. Hughes (Reg. No. 76,592)
Customer No. 64,735

Attorney for Patent Owner
Brain Corporation

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **PATENT OWNER'S MOTION FOR PROTECTIVE ORDER** is being served electronically on December 29, 2025, to the e-mail addresses shown below:

Brian M. Buroker (Reg. No. 39,125) Gibson, Dunn & Crutcher LLP 1050 Connecticut Ave. NW Washington, DC 20036 Phone: (202) 955-8500 Fax: (202) 467-0539 Email: bburoker@gibsondunn.com GDC-AvidbotsIPR@gibsondunn.com	Nathan Curtis (Reg. No. 70,471) Gibson, Dunn & Crutcher LLP 2001 Ross Avenue Suite 2100 Dallas, TX 75201 Phone: (214) 698-3423 Fax: (214) 571-2961 Email: ncurtis@gibsondunn.com
L. Kieran Kieckhefer (*pro hac vice* forthcoming) One Embarcadero Center Suite 2600 San Francisco, CA 94111 Phone: (415) 393-8200 Email: kkieckhefer@gibsondunn.com	Ahmed E. ElDessouki (*pro hac vice* forthcoming) Gibson, Dunn & Crutcher LLP 200 Park Avenue New York, NY 10166 Phone: (212) 351-4000 Email: aeldessouki@gibsondunn.com

KNOBBE, MARTENS, OLSON & BEAR, LLP

Dated: December 29, 2025

/Daniel P. Hughes/
Daniel P. Hughes (Reg. No. 76,592)
Customer No. 64,735

Attorney for Patent Owner
Brain Corporation