

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
Patent No. 10,823,576

**DECLARATION OF ALLAN LE AN IN SUPPORT OF
PATENT OWNER'S REQUEST FOR DISCRETIONARY DENIAL**

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I, Allan Le An, declare as follows:

1. I am the Head of Finance at Brain Corporation (“Brain”), Patent Owner in this proceeding. My responsibilities include understanding Brain’s technology and providing input on marketing materials including Brain’s website. My responsibilities also include understanding Brain’s business relationships including with Brain’s commercial partners. I have personal knowledge of the matters set forth herein and, if called upon to testify, I could and would testify competently thereto. I submit this Declaration in support of Patent Owner’s Brief in Support of Discretionary Denial Under 35 U.S.C. §314(a).

2. A true and correct printout of Brain Corporation’s patent marking website (braincorp.com/legal/brain-corp-patents) is being submitted herewith as Exhibit 2019. Brain periodically updates its patent marking website throughout the year. U.S. Patent No. 10,823,576 (“’576 Patent”) issued on Nov. 3, 2020. Thus, Brain would have updated its patent marking website to include the ’576 Patent during one of its periodic updates shortly thereafter, sometime in late 2020 or early 2021.

3. Consistent with Brain’s patent marking website, I understand that Brain’s ’576 Patent is practiced by Brain’s technology, BrainOS®. BrainOS® is an industry leading artificial intelligence software platform for operating and managing autonomous mobile robots to help retailers, schools, warehouses more

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autonomously clean floors and manage inventory through shelf-scanning. BrainOS® is an operating system for autonomous robots that powers numerous products offered by Brain's commercial partners. These retail products include the ICE RS26, Minuteman International RoboScrub 20, Tennant Company T7AMR, T380 AMR, T16AMR, X4 ROVR, and X6 ROVR, Nilfisk A/S SC60, Softbank Robotics Whiz, Dane Technologies Inc. ADT (Autonomous Delivery Tug), Dane Technologies Inc. Dane AiR™ and Dane AiR™ DC, BrainOS® InventoryAI, and Kärcher KiraCV60 and B100R.

4. Based on my conversation with Dr. Micah Richert, Senior Principal Autonomy Engineer at Brain, I understand the inventions claimed in the '576 Patent were incorporated into BrainOS® at least as of [REDACTED]. At that time or shortly thereafter, all products operating BrainOS® began practicing the inventions claimed in the '576 Patent when the products updated to the latest version of BrainOS®.

5. As of now, more than 40,000 robots deployed worldwide run on BrainOS® and practice the '576 Patent, with over 21 million total hours of operation to date. A true and correct printout of Brain's website, www.braincorp.com, which lists these statistics is being submitted herewith as Exhibit 2020.

6. Between 2015 and 2020, Brain spent over [REDACTED] dollars researching, developing, designing, and implementing its BrainOS® operating

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system. The inventions claimed in the '576 Patent are a key component to BrainOS[®] and allow products operating with BrainOS[®] to accurately navigate their surroundings while moving autonomously.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 19, 2026

Signed by:
By: Allan Le An
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Allan Le An