

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BRAIN CORPORATION, a California
Corporation,

Plaintiff and Counterclaim-
Defendant,

v.

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

Defendants and Counterclaim-
Plaintiffs

Case No. 1:24-cv-12569

Honorable Jeremy C. Daniel

**PLAINTIFF BRAIN CORPORATION’S FIRST SUPPLEMENTAL OBJECTIONS AND
RESPONSE TO DEFENDANTS’ THIRD SET OF INTERROGATORIES (NO. 20)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Brain Corporation (“Brain”), hereby supplements its response to Defendants Avidbots Corp. and Avidbots USA Corp.’s (collectively “Defendants”) Third Set of Interrogatories (No. 20) (“Defendants’ Interrogatories”). Brain incorporates by reference the general and specific objections set forth in its initial response to Defendants’ third set of interrogatories:

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 20:

Identify and describe in detail each license or attempt to license technology or software from Brain that relates to the subject matter of the Brain Asserted Patents (including licenses relating to BrainOS), including identifying and describing in detail all persons or entities that have been granted, sought, or otherwise been offered such a license; all persons involved in negotiations for each such license or attempt to license; the circumstances surrounding such

RESPONSE TO INTERROGATORY NO. 20:

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]	[REDACTED]	[REDACTED]
------------	------------	------------

[REDACTED]	[REDACTED]	[REDACTED]
------------	------------	------------

[REDACTED]	[REDACTED]	[REDACTED]
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[REDACTED]

[REDACTED]

[REDACTED]

Dated: November 21, 2025

KNOBBE, MARTENS, OLSON & BEAR,
LLP

Sheila N. Swaroop (*Pro Hac Vice*)
Marko Zoretic
Kendall M. Loebbaka (*Pro Hac Vice*)
KNOBBE, MARTENS, OLSON & BEAR,
LLP
2040 Main St., 14th Floor
Irvine, CA 92614
Tel: (949) 760-0404
Sheila.Swaroop@knobbe.com
Marko.Zoretic@knobbe.com
Kendall.Loebbaka@knobbe.com

By: /s/ Daniel P. Hughes
Daniel P. Hughes (*Pro Hac Vice*)
Adam B. Powell (*Pro Hac Vice*)
KNOBBE, MARTENS, OLSON & BEAR,
LLP
3579 Valley Centre Dr., Suite 300
San Diego, CA 92130
Tel: (858) 707-4000
Daniel.Hughes@knobbe.com
Adam.Powell@knobbe.com

Kevin Tottis (ARDC No. 6193853)
ktottis@tottislaw.com
Keith Stoltz (ARDC No. 6244848)
kstoltz@tottislaw.com

TottisLaw
401 N. Michigan Avenue
Suite 530
Chicago, IL 60611 Tel: (312) 527-1400
Fax: (312) 589-7192

*Counsel for Plaintiff
Brain Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2025, a true and correct copy of the within document was served on the following counsel of record at the addresses in the manner indicated:

VIA EMAIL:

Daniel I. Konieczny TABEET DIVITO & ROTHSTEIN, LLC 209 S. LaSalle Street, 7th Floor Chicago, IL 60604 T: (312) 762-9450 E: dkonieczny@tdrlaw.com	L. Kieran Kieckhefer Neema Jalali GIBSON, DUNN & CRUTCHER, LLP One Embarcadero Center, Suite 2600 San Francisco, CA 94111 T: (415) 939-8200 E: kkieckhefer@gibsondunn.com E: njalali@gibsondunn.com
Ahmed E. ElDessouki GIBSON, DUNN & CRUTCHER, LLP 200 Park Ave. New York, NY 10166 T: (212) 351-4000 E: aeldessouki@gibsondunn.com	Lillian J. Mao GIBSON, DUNN & CRUTCHER, LLP 310 University Ave. Palo Alto, CA 94301 T: (650) 849-5300 E: lmao@gibsondunn.com
Brian Buroker GIBSON, DUNN & CRUTCHER, LLP 1050 Connecticut Avenue, N.W., Suite 200 Washington, DC 20036 T: (202) 955-8541 E: bburoker@gibsondunn.com	

Executed on November 21, 2025, at Irvine, California


Brandon Hernandez