From:	Director_Discretionary_Decision
To:	Daniel Kiang; Director_Discretionary_Decision; Director_DI; Trials
Cc:	Buroker, Brian M.; *** GDC-AvidbotsIPR - EXT; Kieckhefer, L. Kieran; ElDessouki, Ahmed; Curtis, Nathan R.; BoxBRAIL.002LP; BoxBRAIL.002LP2; BoxBRAIL.002LP3; BoxBRAIL.002LP4; BoxBRAIL.002LP5; Daniel Hughes; Sheila Swaroop; Adam Powell
Subject:	RE: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Protective order
Date:	Friday, January 9, 2026 8:28:05 AM

Patent Owner may file its upcoming discretionary denial brief under seal with an accompanying motion to seal while the unopposed motion for protective order is pending.

From: Daniel Kiang <Daniel.Kiang@knobbe.com>
Sent: Thursday, January 8, 2026 1:58 PM
To: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>; Director_DI <Director_DI@uspto.gov>; Trials <Trials@USPTO.GOV>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>; *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; ElDessouki, Ahmed <AElDessouki@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; BoxBRAIL.002LP <BoxBRAIL.002LP@knobbe.com>; BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>; BoxBRAIL.002LP3 <BoxBRAIL.002LP3@knobbe.com>; BoxBRAIL.002LP4 <BoxBRAIL.002LP4@knobbe.com>; BoxBRAIL.002LP5 <BoxBRAIL.002LP5@knobbe.com>; Daniel Hughes <Daniel.Hughes@knobbe.com>; Sheila Swaroop <Sheila.Swaroop@knobbe.com>; Adam Powell <Adam.Powell@knobbe.com>
Subject: Re: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Protective order

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Dear Honorable Board,

Pursuant to the Board's email below, Patent Owner Brain Corporation filed an unopposed motion for protective order in IPR2025-01600 through -1604 on December 29, 2025. Patent Owner's first discretionary denial brief is due this coming Monday, January 12, in IPR2025-01600 (original deadline falling on Saturday, January 10). In the upcoming brief, Patent Owner intends to rely upon Petitioner's confidential information in support of Patent Owner's "settled expectations" arguments. Because of the imminent deadline and the fact that the parties have agreed to the terms of the proposed protective order (see December 23 email below), Patent Owner respectfully requests that the Board grant the unopposed motion for protective order before January 12, 2026.

Alternatively, could the Board please confirm that Patent Owner may file its upcoming discretionary denial brief under seal with an accompanying motion to seal while the unopposed motion for protective order is pending?

Petitioner's counsel is copied on this email.

Best regards,
Daniel

Daniel Kiang
Partner
949-721-5205 **Direct**
Knobbe Martens

From: Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>
Date: Monday, December 29, 2025 at 12:23 PM
To: Director_DI <Director_DI@uspto.gov>, Director_Discretionary_Decision <Director_Discretionary_Decision@uspto.gov>, Daniel Kiang <Daniel.Kiang@knobbe.com>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>, *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>, Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>, ElDessouki, Ahmed <AElDessouki@gibsondunn.com>, Curtis, Nathan R. <NCurtis@gibsondunn.com>, BoxBRAIL.002LP <BoxBRAIL.002LP@knobbe.com>, BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>, BoxBRAIL.002LP3 <BoxBRAIL.002LP3@knobbe.com>, BoxBRAIL.002LP4 <BoxBRAIL.002LP4@knobbe.com>, BoxBRAIL.002LP5 <BoxBRAIL.002LP5@knobbe.com>, Daniel Hughes <Daniel.Hughes@knobbe.com>, Sheila Swaroop <Sheila.Swaroop@knobbe.com>, Adam Powell <Adam.Powell@knobbe.com>
Subject: RE: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Request for authorization for motion for protective order

Patent Owner may file the motion and include the protective order as an exhibit to the motion.

From: Daniel Kiang <Daniel.Kiang@knobbe.com>
Sent: Tuesday, December 23, 2025 2:53 PM
To: Trials <Trials@USPTO.GOV>
Cc: Buroker, Brian M. <BBuroker@gibsondunn.com>; *** GDC-AvidbotsIPR - EXT <GDC-AvidbotsIPR@gibsondunn.com>; Kieckhefer, L. Kieran <KKieckhefer@gibsondunn.com>; ElDessouki, Ahmed <AElDessouki@gibsondunn.com>; Curtis, Nathan R. <NCurtis@gibsondunn.com>; BoxBRAIL.002LP <BoxBRAIL.002LP@knobbe.com>; BoxBRAIL.002LP2 <BoxBRAIL.002LP2@knobbe.com>; BoxBRAIL.002LP3 <BoxBRAIL.002LP3@knobbe.com>; BoxBRAIL.002LP4 <BoxBRAIL.002LP4@knobbe.com>; BoxBRAIL.002LP5 <BoxBRAIL.002LP5@knobbe.com>; Daniel Hughes <Daniel.Hughes@knobbe.com>; Sheila Swaroop <Sheila.Swaroop@knobbe.com>; Adam Powell <Adam.Powell@knobbe.com>

Subject: Avidbots v. Brain, IPR2025-01600, -01601, -01602, -01603, -01604 | Request for authorization for motion for protective order

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Dear Honorable Board,

Patent Owner Brain Corporation requests authorization to file a motion for protective order in IPR2025-01600, -01601, -01602, -01603, -01604. Patent Owner intends to file confidential information from a related district court litigation in support of its Discretionary Denial Briefs and Patent Owner Preliminary Responses, with the first brief due January 10, 2026. Patent Owner and Petitioners Avidbots Corp. and Avidbots USA Corp. ("Petitioners") have conferred and agreed to a modified version of the Board's default protective order that: (1) adds an attorneys'-eyes-only level of confidentiality and (2) adds a provision that neither party will oppose a request to expunge confidential information after final disposition of the proceedings.

A copy of the proposed protective order has not been attached in view of the Board's general prohibition on attachments in emails to the Board. However, the parties can attach a copy of the proposed protective order and a redlined comparison against the default protective order if requested.

In view of the parties' agreement on the protective order, the parties do not believe a teleconference is necessary, but can provide their availability if requested.

Petitioners' counsel are copied on this email.

Best regards,
Daniel

Daniel Kiang
Partner
Daniel.Kiang@knobbe.com
(949) 760-0404 **Main**
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