UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZESTY.AI, INC.

Petitioner,

v.

AON RE, INC.

Patent Owner.

Case No. IPR2025-01357

U.S. Patent No. 10,650,285

DECLARATION OF DAN DICK

I, Dan Dick, declare as follows:

1. I am an Executive Managing Director and the Global Head of Property Analytics for Aon Re, Inc., the patent owner in this *inter partes* review proceeding. I have been employed by Aon for over twenty-seven years. I make this declaration based on my own personal knowledge as to the facts set forth below. If called to testify live, I could and would competently testify as to the facts recited below. I make this declaration in connection with Aon Re, Inc.'s brief requesting discretionary denial of this proceeding.

2. On June 4, 2020, I had a telephone conversation with Attila Toth, the Chief Executive Officer of Zesty.ai, Inc. ("Zesty"). The purpose of the phone call was to advise Mr. Toth and Zesty of the existence of U.S. Patent Nos. 10,529,029 and 10,650,285 and to ask that Zesty review the patents to assess whether it was interested in a license. During that call, I provided Mr. Toth with the patent numbers. On June 5, 2020, Mr. Toth and I spoke again, and Mr. Toth confirmed that he had shared the patent numbers with Zesty's counsel.

3. On July 9, 2020, Aon and Zesty met via Webex. In addition to Aon and Zesty employees, the call was attended by outside counsel for both Aon and Zesty. During the call, I recall Zesty's outside counsel vaguely mentioning that Zesty was aware of prior art that it claimed would render Aon's patents invalid. Zesty's counsel did not share the details of this alleged prior art. During this same

call, Aon's outside counsel shared Aon's position that Zesty infringed the '029 and '285 patents.

4. I hereby declare that all statements made are of my own knowledge, are true, and that all statements made, on information and belief, are believed to be true. I further declare that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of this proceeding.

Dated: September 30, 2025 By: Signed by: 28F09A7657984E6...
Dan Dick