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 W. COOK ALCIATI

I, W. Cook Alciati, declare as follows:

1. I am back-up counsel for Patent Owner Aon Re, Inc. ("Aon") in this proceeding, pending *pro hac vice* admission. I make this declaration in support of Patent Owner's Discretionary Denial Brief ("Request"). I am familiar with the facts and issues underlying this proceeding. All information provided herein is based on my personal knowledge, unless otherwise stated.

2. Included as Exhibit 2002 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc. CEO Attila Toth's Letter to Aon dated July 21, 2025.

3. Included as Exhibit 2003 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 10,529,029 enclosed with Exhibit 2002.

4. Included as Exhibit 2004 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 10,650,285 enclosed with Exhibit 2002.

5. Included as Exhibit 2005 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 11,195,058 enclosed with Exhibit 2002.

6. Included as Exhibit 2006 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 11,030,491 enclosed with Exhibit 2002.

7. Included as Exhibit 2007 to Patent Owner's Request is a true and correct copy of an email exchange between myself and Zesty.ai, Inc. CEO Attila Toth.

8. Included as Exhibit 2008 to Patent Owner's Request is a true and correct copy of a decision issued by the Court on July 15, 2025, in Case No. 1:25-cv-00201 (D. Del).

9. Included as Exhibit 2009 to Patent Owner's Request is a true and correct copy of a presentation titled "More than Just a Big Idea: How big data and deep learning is helping Japanese insurers to protect homeowners from Nat Cat risk?"

10. Included as Exhibit 2010 to Patent Owner's Request is a true and correct copy of the Declaration of Dan Dick executed on September 30, 2025.

11. Included as Exhibit 2011 to Patent Owner's Request is a true and correct copy of an email exchange between myself and Zesty.ai, Inc.'s previous counsel (Greg Sueoka).

12. Included as Exhibit 2012 to Patent Owner's Request is a true and correct copy of Aon's initial notice letter to Zesty.ai, Inc. dated April 20, 2023.

13. Included as Exhibit 2013 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc.'s Opening Brief in Support of its Motion to Dismiss under 35 U.S.C. § 101 in Case No. 1:25-cv-00201 (D. Del.).

14. Included as Exhibit 2014 to Patent Owner's Request is a true and correct copy of Zesty.ai, Inc.'s Reply Brief in Support of its Motion to Dismiss under 35 U.S.C. § 101, Case No. 1:25-cv-00201 (D. Del.).

15. Included as Exhibit 2015 to Patent Owner's Request is a true and correct copy of the Scheduling Order in Case No. 1:25-cv-00201 (D. Del.).

16. Included as Exhibit 2016 to Patent Owner's Request is a true and correct copy of an email received by myself from Zesty.ai, Inc.'s litigation counsel (Karim Oussayef).

17. Included as Exhibit 2017 to Patent Owner's Request is a true and correct copy of an email exchange between Aon's Executive Managing Director and the Global Head of Property Analytics Dan Dick and Zesty.ai, Inc. CEO Attila Toth.

18. I declare under penalty of perjury that the foregoing is true and accurate to the best of my present knowledge and recollection.

Executed on October 3, 2025

/s/ W. Cook Alciati
W. Cook Alciati (*pro hac vice* admission pending)