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. IPR2025-01359

U.S. Patent No. 11,195,058

PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE* OF W. COOK ALCIATI

I. RELIEF REQUESTED

Pursuant to 37 C.F.R. § 42.10, Patent Owner Aon Re, Inc. requests that the Board admit W. Cook Alciati *pro hac vice* in this proceeding. Petitioner has indicated that it will not oppose this motion.

II. GOVERNING RULE

Pursuant to 37 C.F.R. §42.10(c), the Board

> may recognize counsel *pro hac vice* during a proceeding upon a showing of good cause, subject to the condition that lead counsel be a registered practitioner and to any other conditions as the Board may impose. For example, where the lead counsel is a registered practitioner, a motion to appear *pro hac vice* by counsel who is not a registered practitioner may be granted upon showing that counsel is an experienced litigating attorney and has an established familiarity with the subject matter at issue in the proceeding.

III. SHOWING UNDER 37 C.F.R. § 42.10(c)

The undersigned is a registered practitioner and is experienced in *inter partes* proceedings before the Board. W. Cook Alciati is a member in good standing of the New York State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations, and is admitted to practice in the United States District Court for the Western District of New York, the United States District Court for the Western District of Wisconsin, the United States Court of Appeals for the Ninth Circuit and the United States Court of Appeals for the Federal Circuit. (Ex. 2001, ¶2). Mr. Alciati has been litigating

patent cases for approximately fourteen years and has been involved in several *inter partes* reviews and reexamination proceedings. (*Id.*, ¶1)

Mr. Alciati has familiarity with the subject matter at issue in the proceeding. Mr. Alciati has reviewed U.S. Patent No. 11,195,058. Mr. Alciati is also counsel for Plaintiff in the related district court litigation *Aon Re, Inc. v. Zesty.AI, Inc.*, No. 1:25-cv-00201-JFM (D. Del.). Moreover, Mr. Alciati has reviewed the petition for *inter partes* review (the "Petition"), the declaration of Dr. David A. Forsyth as well as the primary reference at issue in the Petition – Gross. (*Id.*, ¶8). Therefore, Mr. Alciati has familiarity with the subject matter at issue in the proceeding. Mr. Alciati has also been admitted *pro hac vice* before the Board in IPR2014-01235, IPR2015-00249, IPR2017-01809, IPR2017-01810, IPR2019-00405, IPR2019-00408, IPR2019-00409, IPR2022-00527, IPR2022-00528, IPR2022-00574, IPR2022-00757, IPR2022-00758, IPR2022-01566, IPR2023-00852, IPR2024-00192 and IPR2024-00193. (*Id.*, ¶7).

IV. CONCLUSION

For the foregoing reasons, Patent Owner respectfully requests that the Board admit W. Cook Alciati *pro hac vice* as back-up counsel in this proceeding.

Dated: September 8, 2025

Respectfully submitted,

GARDELLA ALCIATI P.A.

By: /Greg H. Gardella/
Greg H. Gardella (Reg. No. 46,045)
Email: ggardella@ga-iplaw.com
Michael J. Stimson (Reg. No. 45,429)
Email: mstimson@ga-iplaw.com
GARDELLA ALCIATI P.A.
80 M Street SE, 1st Floor
Washington, D.C. 20003
Phone: 703-556-9600
Fax: 703-740-4541

Attorneys for Patent Owner
Aon Re, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing PATENT OWNER'S MOTION FOR ADMISSION *PRO HAC VICE* OF W. COOK ALCIATI, along with any supporting document(s), was served in its entirety by filing through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as providing a courtesy copy via e-mail to the following attorneys of record for the Petitioner listed below:

Lead Counsel: Daniel S. Block
dblock-PTAB@sternekessler.com

Back-up Counsel: Jennifer Meyer Chagnon
Justin D. Wang
jchagnon-PTAB@sternekessler.com
jwang-PTAB@sternekessler.com
PTAB@sternekessler.com

Dated: September 8, 2025

By: /Greg H. Gardella/
Name: Greg H. Gardella
GARDELLA ALCIATI P.A.