IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

AON RE, INC., Plaintiff, v. ZESTY.AI, INC., Defendant.	Civil Action No. 25-201-JFM

DEFENDANT'S REPLY BRIEF IN SUPPORT OF ITS MOTION TO DISMISS UNDER 35 U.S.C. § 101

Dated: June 13, 2025

Brian Farnan (No. 4089)
Michael Farnan (No. 5165)
FARNAN LLP
919 N. Market St., 12th Floor
Wilmington, DE 19801
Telephone: (302) 777-0300
Facsimile: (302) 777-0301

John M. Desmarais (*pro hac vice*)
Karim Z. Oussayef (*pro hac vice*)
Frederick J. Ding (*pro hac vice*)
Caitrianne Feddeler (*pro hac vice*)
Kevin Goon (*pro hac vice*)
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Telephone: 212-351-3400
Facsimile: 212-351-3401

Attorneys for Defendant Zesty.AI, Inc.

TABLE OF CONTENTS

Page

I. INTRODUCTION 1

II. ARGUMENT 1

A. *Alice* Step One: The Claims Are Directed To The Abstract Idea Of Looking At Aerial Imagery To Estimate Risk, For Which Computers Are Invoked Merely As A Tool. 1

1. ZestyAI Met Its Burden To Show That The Claims Are Abstract. 1

2. The Claims Are Not Directed To A Specific Improvement In Computer Capabilities—They Merely Invoke Computers As A Tool. 4

3. The Caselaw Confirms That The Claims Are Abstract. 7

B. *Alice* Step Two: The Claims Do Not Recite An Inventive Concept. 9

CONCLUSION 10

TABLE OF AUTHORITIES

Cases **Page(s)**

Accenture Glob. Servs., GmbH v. Guidewire Software, Inc.,
728 F.3d 1336 (Fed. Cir. 2013).....6, 7

Amdocs (Israel) Ltd. v. Openet Telecom, Inc.,
841 F.3d 1288 (Fed. Cir. 2016).....10

Ashcroft v. Iqbal,
556 U.S. 662 (2009).....9

Bell Atlantic Corp. v. Twombly,
550 U.S. 544 (2007).....9

*Berkeley*IEOR v. Teradata Operations, Inc.*,
719 F. Supp. 3d 842 (N.D. Ill. 2024).....5

Credit Acceptance Corp. v. Westlake Servs.,
859 F.3d 1044 (Fed. Cir. 2017).....6

Dental Monitoring SAS v. Align Tech.,
No. C 22-07335 WHA, 2024 WL 2261931 (N.D. Cal. May 16, 2024).....7

Diamond v. Diehr,
450 U.S. 175 (1981).....4

EagleView Techs, Inc. v. Nearmap US, Inc.,
No. 2:21-283, 2021 WL 5299729 (D. Utah Nov. 15, 2021).....8

EcoServices, LLC v. Certified Aviation Servs., LLC,
830 F. App'x 634 (Fed. Cir. 2020).....9

Electric Power Grp. v. Alstom S.A.,
830 F.3d 1350 (Fed. Cir. 2016).....10

Intell. Ventures I LLC v. Symantec Corp.,
838 F.3d 1307 (Fed. Cir. 2016).....4

Luxer Corp. v. Parcel Pending, Inc.,
No. 1:24-cv-00604, 2025 WL 417049 (D. Del. Feb. 6, 2025).....4

McRO, Inc. v. Bandai Namco Games America Inc.,
837 F.3d 1299 (Fed. Cir. 2016).....8

Mobile Acuity Ltd. v. Blippar Ltd.,
110 F.4th 1280 (Fed. Cir. 2024).....2

TABLE OF AUTHORITIES (cont'd)

Pages

PersonalWeb Techs. LLC v. Google LLC,
8 F.4th 1310 (Fed. Cir. 2021) 4, 6

Recentive Analytics, Inc. v. Fox Corp.,
134 F.4th 1205 (Fed. Cir. Apr. 18, 2025) ..... *passim*

Reputation.com, Inc. v. Birdeye, Inc.,
No. cv-21-129-LPS-CJB, 2022 WL 609161 (D. Del. Jan 31, 2022).....10

SAP Am., Inc. v. InvestPic, LLC,
898 F.3d 1161 (Fed. Cir. 2018).....4

Simio, LLC v. FlexSim Software Prods., Inc.,
983 F.3d 1353 (Fed. Cir. 2020).....9

Trading Techs. Int'l, Inc. v. CQG, INC.,
675 F. App'x 1001 (Fed. Cir. 2017) 6

Vaporstream, Inc. v. Snap Inc.,
No. 2:17-cv-220, 2018 WL 1116530 (C.D. Cal. Feb. 27, 2018) 9

Other Authorities

Federal Rules of Civil Procedure Rule 12(b)(6) 9

All emphasis added unless otherwise noted.

I. INTRODUCTION

Under *Alice* Step One, the asserted claims are directed to the abstract idea of looking at aerial imagery to estimate risk. D.I. 19 ("Br.") at 4–14. Aon cannot escape this conclusion. First, Aon second-guesses the exact words ZestyAI uses to articulate the abstract concept without addressing the substance of the argument. D.I. 25 ("Opp.") at 5–8. Next, Aon questions whether the claims automate human activity despite conceding this point in its patents, in its Complaint, and in other parts of its brief. Opp. at 8–11. Then, Aon offers a flawed alternative characterization of the claims by improperly importing unclaimed concepts, such as "improved computer architecture" and "multi-tiered" machine learning classifiers. Opp. at 11. Finally, Aon relies on generic assertions of "efficiency" and "accuracy" (Opp. at 12–13), which are irrelevant because any purported gains are the result of preempting human behavior—not improving computer systems. In the end, Aon is unable to distinguish *Recentive* (Opp. at 14–17), which dealt with very similar claims and held that applying machine learning to a particular business context is abstract.

Under *Alice* Step Two, the claims use generic components in conventional combinations. Br. at 14–20. Aon's response merely parrots the legal assertions in the Complaint and the claim language, without substantive analysis. Opp. at 17–20. That cannot save the abstract claims.

II. ARGUMENT

A. *Alice* Step One: The Claims Are Directed To The Abstract Idea Of Looking At Aerial Imagery To Estimate Risk, For Which Computers Are Invoked Merely As A Tool.

1. ZestyAI Met Its Burden To Show That The Claims Are Abstract.

Aon begins its opposition by quibbling about the exact wording of the abstract concept. Opp. at 6–11. Those complaints do not address the substance of ZestyAI's argument.

First, contrary to Aon's assertion, ZestyAI consistently articulated the abstract concept. Indeed, ZestyAI began its Argument by clearly stating: "The Claims Are Directed To The Abstract

Idea Of Looking At Aerial Imagery To Estimate Risk, For Which Computers Are Invoked Merely As A Tool." Br. at 4. Aon characterizes this concept as a "moving target" by cherry picking phrases from ZestyAI's brief. Br. at 6. But even the phrases that Aon chooses—such as "look at a house, categorize the house, and estimate the risk to that house," "analyzing images and assessing risk," "looking at aerial imagery to estimate risk," "analyzing images and assessing risk," and "image recognition and risk assessment" (*see* Opp. at 6)—are consistent. Aon does not attempt to argue that those trivial linguistic differences would change the conclusion. They would not.

Second, Aon alleges that ZestyAI has not met its burden to address all the claims. Opp. at 6. Yet Aon recognizes that ZestyAI need only make a "prima facie showing" that the representative claim is substantially similar and linked to the same abstract idea as the other claims. Opp. at 6–7 (citing *Mobile Acuity Ltd. v. Blippar Ltd.*, 110 F.4th 1280, 1290 (Fed. Cir. 2024)). ZestyAI did so. ZestyAI identified Claim 1 of the '029 Patent and explained how the rest of Aon's asserted claims relate to the same abstract idea using the intrinsic record. *See* Br. at 5–10. And ZestyAI explained in detail why the other claims add nothing else inventive, tackling the specific language recited in those other claims. Br. at 16–18.

Once the patent challenger makes a prima facie showing, "the burden shifts to the patent owner to present non-frivolous arguments as to why the eligibility of the identified representative claim cannot fairly be treated as decisive of the eligibility of all claims in the group." *Mobile Acuity*, 110 F.4th at 1290. Here, Aon points to a single claim where a risk estimate is made "in 'real-time.'" Opp. at 7. That is not a substantive "argument." *Id.* Regardless, the claims in *Recentive* also involved "real-time" claim elements and were still found to be abstract. *Recentive Analytics, Inc. v. Fox Corp.*, 134 F.4th 1205, 1208 n.2, 1210 (Fed. Cir. Apr. 18, 2025).

Aon also argues that certain claims do not use the word "risk." Opp. at 7. Yet the common specification confirms that all the patents were directed to "analyz[ing] aerial imagery and automatically extract[ing] characteristics of individual properties" so that "risk of damage due to disaster can be more accurately estimated." '285 patent at 2:11–20; '029 patent at 2:6–15; '491 patent at 2:21–30; '058 patent at 2:16–25. And even if Aon were correct that some claims only involved image analysis in the abstract, that is a classic patent-ineligible idea. Br. at 9–10.

Third, Aon asserts that ZestyAI "never addresse[d]" certain limitations, such as "pixel groupings," "boundary information," and "property characteristic [and condition] profiles." Opp. at 8. To the contrary, ZestyAI explained that while "[s]ome claims recite 'pixel groupings'" or "'apply[ing] boundary information,'" those steps add nothing inventive. Br. at 16–17. Similarly, ZestyAI analyzed the use of "machine learning classifiers" and "profiles," explaining why they do not provide an inventive concept. Br. at 12–13, 15–16. Aon has no response.

Fourth, Aon argues that ZestyAI fails to show the claims automate a human process. Opp. at 8–9. This argument is puzzling because Aon has repeatedly conceded this point. Aon's patents explain that "[t]he inventors recognized that deep learning methodology could be applied to risk exposure" and that "[o]ne of the promises of deep learning is ***replacing the human identification of features***." '029 patent, 2:2–9. Aon's Complaint admits that the invention "***automates prior processes*** of manually obtaining data about, for example, roof condition and then comparing that to manually obtained control data that allowed an insurer to predict roof condition as part of a property risk assessment." Br. at 18 (citing Compl. ¶ 18). Aon's Swanson reference confirms that in 2012, ***before*** Aon's patents, humans looked at rooftops and assessed insurance risk based on what they saw: "[m]anual inspection [was] conducted by driving to the geographic location, obtaining permission from the property owners to mount the structure, then setting up a ladder to

climb onto the roof." Opp. at 3 (citing Ex. A at 1:60–63). Aon's admissions about human automation are a "telltale sign of abstraction." *PersonalWeb Techs. LLC v. Google LLC*, 8 F.4th 1310, 1316 (Fed. Cir. 2021).

Aon argues incorrectly that ZestyAI must show that "human underwriters performed Zesty's alleged 'thought' process as of Aon's September 2016 priority date." Opp. at 9. As discussed above, that is exactly what Aon has admitted. Regardless, Aon confuses the § 101 analysis (*i.e.*, whether the claims are ***abstract***) and the §§ 102 / 103 analysis (*i.e.*, whether the claims are ***novel and non-obvious***). *See SAP Am., Inc. v. InvestPic, LLC*, 898 F.3d 1161, 1163 (Fed. Cir. 2018) (distinguishing the § 101 analysis from the §§ 102 / 103 analysis). Indeed, it has been settled law for decades that "the 'novelty' of any element or steps in a process, or even of the process itself, is of no relevance in determining whether the subject matter of a claim falls within the § 101 categories of possibly patentable subject matter." *Intell. Ventures I LLC v. Symantec Corp.*, 838 F.3d 1307, 1315 (Fed. Cir. 2016) (quoting *Diamond v. Diehr*, 450 U.S. 175, 188–89 (1981)). The relevant question is whether the claims "essentially automate actions that ***would normally be performed by the human mind*** or by a human with pen and paper." *Luxer Corp. v. Parcel Pending, Inc.*, No. 1:24-cv-00604, 2025 WL 417049, at *7 (D. Del. Feb. 6, 2025).

2. The Claims Are Not Directed To A Specific Improvement In Computer Capabilities—They Merely Invoke Computers As A Tool.

ZestyAI showed that Aon's claims merely invoke computers as a tool. Br. at 10–14. Aon's attempts to show otherwise are not persuasive.

Aon's efficiency and accuracy arguments are premised on the following characterization of the claims: "The improved computer architecture executes multi-tiered machine learning classifiers each trained on specific data to perform specific functions on information extracted from aerial imagery." Opp. at 11. Every part of that characterization is inaccurate. ***First***,

"improved computer architecture" is attorney argument. Br. at 18. The patents refer to generic (not improved) steps, (Br. at 7–8) and the specification refers to generic (not improved) components, (Br. at 14–18). ***Second***, "multi-tiered" classifiers never appear in the claims or even the specification. Presumably, Aon uses the term "multi-tiered" to make the two generic machine learning classifiers appear more concrete. But those "established methods of machine learning" cannot save the claims. *Recentive*, 134 F.4th at 1211. ***Third***, the claims do not say that the two classifiers are "each trained on specific data to perform specific functions." Rather, the claims use functional language to say ***what*** the classifiers do (determining "characteristics" and "conditions") without saying ***how*** they do it. *See* Br. at 5–6 (claim chart). Finally, "information extracted from aerial imagery" is just a fancy way of saying "looking at an image to find information." Br. at 9–10. In sum, once the extraneous language is removed, Aon's characterization of the claims confirms they are abstract.

a. Aon's claims do not improve computer speed and efficiency; they merely automate human activity.

Aon alleges that the asserted claims use parallel processing to improve "computer speed and efficiency." Opp. at 12–13. In reality, however, Aon's claims do not hint at "multi-tier" processing, parallel execution, or any other inventive configuration of processors. *See* Br. at 18–19. So the claims neither "require" nor "provide for" parallel processing. *Cf.* Opp. at 12 (relying on the "provide for" language in *Berkeley*IEOR v. Teradata Operations, Inc.*, 719 F. Supp. 3d 842, 856 (N.D. Ill. 2024)).

Further, Aon cannot distinguish *OIP Technologies*. While Aon points out that *OIP* addressed speed and accuracy in the Step Two context, it also reaffirmed the broader principle that automating an existing business process is not patentable. After all, the *OIP* court only reached Step Two because the claims failed Step One. In other words, automating human activity fails

both *Alice* Steps. *See, e.g.*, *PersonalWeb*, 8 F.4th at 1318 ("[T]he claims focus on 'mere automation of manual processes using generic computers.' That fails step one.") (quoting *Credit Acceptance Corp. v. Westlake Servs.*, 859 F.3d 1044, 1055 (Fed. Cir. 2017)); *Recentive*, 134 F.4th at 1214 (Fed. Cir. 2025).

b. Aon's claims do not improve computer accuracy; they merely automate human activity.

Aon also argues that the claims improve "the accuracy of the computer's output." Opp. at 13. Here, Aon relies on an assertion in the specification that a test resulted in "an accuracy rate of 94%." *See* '029 patent at 9:18–23. According to Aon, this test shows that the "inventor … chose each model's particular specialization and how they would work together to achieve previously unattained accuracy." Opp. at 13. But that's not what the quote says. Rather, the test is about a single model working alone to identify "rooftop shape"—not a first model and a second model working together as Aon claims—so it is not even an embodiment of the claimed invention. '029 patent at 9:4–7. More importantly, the 94% statistic does not indicate that the claims ***improve*** computer systems—the patents provide no baseline against which to compare this lone number. Finally, even if true, the 94% statistic is about some prototype with undisclosed training data and unclaimed parameters, so this is yet another improper argument based on the complexity of the specification rather than the features actually claimed, as is required. *See* Br. at 20 (citing *Accenture Glob. Servs., GmbH v. Guidewire Software, Inc.*, 728 F.3d 1336, 1345 (Fed. Cir. 2013)).

Aon's reliance on *Trading Technologies* is therefore misplaced. There, the claims covered a specific improvement to a graphical user interface with "no 'pre-electronic analog.'" *Trading Techs. Int'l, Inc. v. CQG, INC.*, 675 F. App'x 1001, 1004 (Fed. Cir. 2017). Here, in contrast, the claims are about automating pre-electronic behavior.

3. The Caselaw Confirms That The Claims Are Abstract.

Aon cannot distinguish *Recentive*, which is the most recent and most relevant case cited by either party. ***First***, Aon argues that the *Recentive* claims cover "any and all machine learning techniques." Opp. at 14. That is dead wrong. The *Recentive* claims are more complex than the Aon claims and include: "a machine learning (ML) model [which is] at least one of a neural network ML model and a support vector ML model," "interactively training the ML model," "user-specific event weights," "detecting a real-time change," "dynamically generating a network map," and "a machine learning technique to optimize an overall television rating." *Recentive*, 134 F.4th at nn.2–3. ***Second***, Aon argues that humans did not previously perform the claim elements. Opp. at 14. That is inaccurate and irrelevant, as discussed above, in Section II.A.1. ***Third***, Aon argues that "*Recentive*'s patentee did not argue that its claims improved computer functionality." That too is incorrect. The patentee argued (1) the models were "iteratively trained," (2) that "the algorithms function dynamically," and (3) the claims required "event parameters." *Recentive*, 134 F.4th at 1212–1213.

Aon's efforts to distinguish other precedents—like *Longitude*, *Accenture*, and *Power Analytics*—are equally unpersuasive. *See* Opp. at 15. In each of those cases, the claims recited abstract objectives—analyzing data or processing information to produce an output—without any specific technological implementation. Br. at 9–10, 12–13. The same is true here.

Tellingly, Aon does not even attempt to distinguish *Dental Monitoring*, a recent decision invalidating claims that closely parallel those asserted here. *See* Br. at 10, 14, 15. In *Dental Monitoring SAS v. Align Tech., Inc.*, the court found claims ineligible that recited acquiring imagery, analyzing it "by means of a deep learning device trained by means of a learning base," determining "a value of an image attribute," comparing that value, and sending an information message related to image quality. No. C 22-07335 WHA, 2024 WL 2261931, at *1–2, 4–5 (N.D.

Cal. May 16, 2024). The same functional structure appears in Aon's claims: acquiring aerial imagery, analyzing it with a machine learning model, classifying features or determining conditions, and returning outputs based on that analysis. Aon's silence on *Dental Monitoring*—despite the obvious similarities—underscores its inability to reconcile its claims with established § 101 analysis.

Even Aon's lead case of *McRO* supports ZestyAI's position by showing how different Aon's claims are from those that have survived the § 101 analysis. *McRO, Inc. v. Bandai Namco Games America Inc.*, 837 F.3d 1299, 1314 (Fed. Cir. 2016). In *McRO*, the court analyzed complex algorithm-specific claims to automate lip synchronization and facial expressions in 3-D computer animation. Unlike Aon's claims, the *McRO* claims are replete with computer-specific terms that have nothing to do with human activity, such as "three-dimensional characters," "output morph weight set stream," "timed data file of phonemes having a plurality of sub-sequences," "generating an intermediate stream," "a plurality of transition parameters," "adjacent morph weight sets," and "desired frame rate." *Id.* at 1308. Unlike Aon's claims, the *McRO* claims concerned how to improve prior art computer techniques (specifically, the "keyframe approach") using an improved computer algorithm (specifically, "rules that are applied to the timed transcript to determine the morph weight outputs"). *Id.* at 1306–08. And unlike Aon's claims, "[i]t is the incorporation of the claimed rules, ***not the use of the computer***, that 'improved [the] existing technological process' by allowing the automation of further tasks." *Id.* at 1314 (citing *Alice*, 134 S.Ct. at 2358). In sum, Aon's claims are undoubtedly more similar to the *Recentive* claims than the *McRO* claims.[1]

[1] The other cases that Aon cites are also clearly distinguishable. *EagleView* is a nonbinding district court case that involved "specific computerized steps" with "specific inputs and outputs to achieve specific goals" such as "displaying a projection of the feature from the modified three-dimensional model." *EagleView Techs, Inc. v. Nearmap US, Inc.*, No. 2:21-283, 2021 WL 5299729 at *1, *4

B. *Alice* Step Two: The Claims Do Not Recite An Inventive Concept.

ZestyAI showed that the claims use a combination of conventional equipment and generic algorithms (Br. at 14–18), and why the allegations in the Complaint are unsupported or irrelevant (Br. at 18–20). Aon has no substantive response. Despite repeatedly invoking the phrase "ordered combination" (Opp. at 17–20), Aon points only to a series of generic steps done in a conventional order that amount to identifying features, classifying them, and estimating risk. Aon provides no analysis on any of those steps—it simply lists claim elements and declares "[t]his is much more than Zesty's abstract ideas," without further explanation. Opp. at 18–19.

Aon also misapplies the pleading standard. While a Rule 12(b)(6) motion requires courts to draw reasonable inferences in the non-movant's favor, courts are not required to accept as true legal conclusions "couched as [] factual allegation[s]." *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009) (quoting *Bell Atlantic Corp. v. Twombly*, 550 U.S. 544, 555 (2007)); *see also Simio, LLC v. FlexSim Software Prods., Inc.*, 983 F.3d 1353, 1363–65 (Fed. Cir. 2020) (rejecting conclusory allegations that the claims were inventive). Thus, Aon's unsupported legal assertions that its claims contain "inventive machine learning algorithms" (*see, e.g.,* Opp. at 19 (citing D.I. 1 ¶ 23)) cannot save the claims.

Unlike the claims in *Vaporstream*, Aon's asserted claims contain no technical detail about how the system achieves any improvement in computing. *See Vaporstream, Inc. v. Snap Inc.*, No. 2:17-cv-220, 2018 WL 1116530, at *2 (C.D. Cal. Feb. 27, 2018). And unlike the defendant in *Vaporstream*, ZestyAI explains that the claims use a combination of conventional equipment and generic algorithms (Br. at 14)—analysis that Aon ignores. Aon's "combination" of conventional

---

(D. Utah Nov. 15, 2021). *EcoServices* is a non-precedential case that involved an improved way to wash a jet engine using a "specific combination of a type of washing unit, information detector, and control unit, configured in a certain way." *EcoServices, LLC v. Certified Aviation Servs., LLC*, 830 F. App'x 634, 643 (Fed. Cir. 2020)).

steps is performed in a conventional order (input → analysis → output) and is precisely the kind of functional abstraction that courts have repeatedly rejected. *See Electric Power Grp. v. Alstom S.A.*, 830 F.3d 1350, 1356 (Fed. Cir. 2016).

Nor does the prosecution history change the analysis. The examiner's pre-*Recentive* conclusion that the claims are eligible "when viewed as an ordered combination" merely paraphrases the *Alice* test. That bare conclusion is not binding and does not create a factual dispute. *Reputation.com, Inc. v. Birdeye, Inc.*, No. cv-21-129-LPS-CJB, 2022 WL 609161 at *6 (D. Del. Jan 31, 2022), adopted 2022 WL 951408 (D. Del. Mar. 30, 2022) ("Obviously, the fact that the Examiner did not find claim 13 to be patent ineligible is not binding on the Court, and it does not end the Court's inquiry here."). Clearly, all patents that are found unpatentable in litigation were previously found to be patentable by the patent office—that's the only way they could end up in litigation.

Finally, Aon's invocation of *Amdocs* is misguided. There, the claims recited a distributed network architecture with specific components performing operations at different locations, thereby reducing storage and improving processing. *Amdocs (Israel) Ltd. v. Openet Telecom, Inc.*, 841 F.3d 1288, 1303 (Fed. Cir. 2016). Here, by contrast, the claims are silent as to system configuration, workload distribution, resource management strategy, or any other implementation details. Br. at 7–8, 14–15.

CONCLUSION

Aon does not dispute that any unpatentable claims should be dismissed with prejudice. Accordingly, for all the reasons above, ZestyAI respectfully requests that this Court hold the asserted claims of the patents-in-suit ineligible under § 101 and dismiss *with prejudice*.

Dated: June 13, 2025

Respectfully submitted,

FARNAN LLP

/s/ Brian E. Farnan

Brian E. Farnan (Bar No. 4089)
Michael J. Farnan (Bar No. 5165)
919 N. Market St., 12th Floor
Wilmington, DE 19801
(302) 777-0338
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

John M. Desmarais (*pro hac vice*)
Karim Z. Oussayef (*pro hac vice*)
Frederick J. Ding (*pro hac vice*)
Caitrianne Feddeler (*pro hac vice*)
Kevin Goon (*pro hac vice*)
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Telephone: 212-351-3400
Facsimile: 212-351-3401
jdesmarais@desmaraisllp.com
koussayef@desmaraisllp.com
fding@desmaraisllp.com
cfeddeler@desmaraisllp.com
kgoon@desmaraisllp.com

Attorneys for Defendant Zesty.AI, Inc.