UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZESTY.AI, INC.,
Petitioner

v.

AON RE, INC.,
Patent Owner

Case IPR2025-01359
U.S. Patent No. 11,195,058

PETITIONER'S SECOND MOTION TO SEAL

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I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner Zesty.ai ("Petitioner") respectfully submits this Motion to Seal portions of Petitioner's Sur-Reply on Discretionary Denial. Petitioner has conferred with Patent Owner Aon Re, Inc. ("Patent Owner") pursuant to 37 C.F.R. § 42.54, and Patent Owner does not oppose the Motion.

II. BACKGROUND

Patent Owner previously filed a Motion to Seal Exhibits 2007, 2011, and 2017 and portions of Patent Owner's Request for Discretionary Denial (Paper 9, "First Motion to Seal"), and a Motion to Seal Exhibit 2022 and portions of Patent Owner's Reply in Support of Its Request for Discretionary Denial (Paper 19). Petitioner previously filed a Motion to Seal portions of Petitioner's Opposition to Patent Owner's Request for Discretionary Denial (Paper 13).

As Patent Owner explains in its First Motion to Seal, good cause exists for sealing the confidential information because "these documents include confidential licensing communications between the parties that require a protective order." Paper 9 at 1. Along with the First Motion to Seal, Patent Owner requested entry of the Board's Default Protective Order. *Id.* at Appendix A.

III. REQUEST TO SEAL

Petitioner requests that the Board seal the portions of Petitioner's Sur-Reply on Discretionary Denial that rely on Exhibits 2007, 2011, 2017, and/or 2022. The

Board's Default Protective Order was previously submitted in this proceeding. *See* Paper 9 at Appendix A. A publicly available redacted version of Petitioner's Sur-Reply on Discretionary Denial is filed concurrently herewith.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal the redacted portions of Petitioner's Sur-Reply on Discretionary Denial.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/ Jennifer Meyer Chagnon /

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Date: November 19, 2025

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CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PETITIONER'S SECOND MOTION TO SEAL** was served in its entirety on November 19, 2025, upon the following parties via electronic mail:

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