

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

ZESTY.AI, INC.,
Petitioner

v.

AON RE, INC.,
Patent Owner

Case IPR2025-01360
U.S. Patent No. 11,030,491

PETITIONER ZESTY.AI, INC.'S *SOTERA* STIPULATION

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U.S. Patent No. 11,030,491 is currently at issue in related district court litigation *Aon Re, Inc. v. Zesty.ai, Inc.*, Civil Action No. 1:25-cv-00201-JFM (D. Del.) (“the District Court Proceeding”).

Petitioner Zesty.ai, Inc. (“Petitioner”) hereby stipulates that, if the Board institutes trial in this *inter partes* review proceeding, Petitioner will not pursue in the District Court Proceeding any grounds raised or that reasonably could have been raised in the Petition. *See Sotera Wireless, Inc. v. Masimo Corp.*, IPR2020-01019, Paper 12 at 18-19 (P.T.A.B. Dec. 1, 2020) (precedential as to § II.A).

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Daniel S. Block/

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Date: August 27, 2025

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

I certify that the above-captioned **PETITIONER ZESTY.AI INC.'S**
SOTERA STIPULATION was served in its entirety on August 27, 2025, upon the
following parties via electronic mail:

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