

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. IPR2025-01360

U.S. Patent No. 11,030,491

**DECLARATION OF W. COOK ALCIATI IN SUPPORT OF
MOTION FOR ADMISSION *PRO HAC VICE*
PURSUANT TO 37 C.F.R. § 42.10**

I, W. Cook Alciati, declare as follows:

1. I am an experienced attorney with more than fourteen years of litigation experience. I have been involved in several *inter partes* reviews and reexamination proceedings.

2. I have been litigating patent cases for approximately fourteen years. I am a member in good standing of the New York State Bar and am 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.

3. I have never been suspended or disbarred from practice before any court or administrative body.

4. I have never had an application for admission to practice before any court or administrative body denied.¹

5. I have had no sanctions or contempt citations imposed against me by any court or administrative body.

¹ In an unrelated matter before the United States District Court for the Southern District of Florida, I initially had a motion for admission *pro hac vice* denied for strictly administrative reasons (e.g., my name did not match exactly the record included on the New York state bar website and our local counsel did not have an active email address). The motion was subsequently granted following the timely submission of a corrected filing.

6. I have read and will comply with the Office Patent Trial Practice Guide and the Board's Rules of Practice for Trials set forth in part 42 of the 37 C.F.R. I agree to be subject to the USPTO Code of Professional Responsibility set forth in 37 C.F.R. §§ 11.101 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

7. I have appeared *pro hac vice* in sixteen other proceedings in front of the Patent Trial and Appeal 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.

8. I have familiarity with the subject matter of this proceeding. I have reviewed U.S. Patent No. 11,030,491. Moreover, I have reviewed the petition for *inter partes* review (the "Petition"), the declaration of Dr. David A. Forsyth, as well as the primary references at issue in the Petition, U.S. Patent Application Publication No. 2015/0186953 to Gross, U.S. Patent No. 10,755,357 to Davis et al. and U.S. Patent No. 6,970,593 to Furukawa.

9. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements are made with the knowledge that willful false

statements and the like so made are punishable by fine or imprisonment, or both,
under Section 1001 of Title 18 of the United States Code.

Dated: September 8, 2025

By: /W. Cook Alciati/
W. Cook Alciati