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'S MOTION TO SEAL

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I. INTRODUCTION

Pursuant to 37 C.F.R. §§ 42.14 and 42.54, Petitioner respectfully submits this Motion to Seal to seal portions of Petitioner's Opposition to Patent Owner's Request for Discretionary Denial. Petitioner has conferred with 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, 2017. *See* Paper 12. As Patent Owner explains in its Motion, good cause exists for sealing the confidential information because "these documents include confidential licensing communications between the parties that require a protective order." Paper 12, 1. Along with the Motion to Seal, Patent Owner requested entry of the Board's Default Protective Order. *Id.*, Appendix A.

III. REQUEST TO SEAL

Petitioner requests that the Board seal the portions of Petitioner's Opposition to Patent Owner's Request for Discretionary Denial that rely on Exhibits 2007, 2011, 2017. The Board's Default Protective Order was previously submitted in this proceeding. *See* Paper 12, Appendix A. A publicly available redacted version of Petitioner's Opposition is filed concurrently herewith.

IV. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that the Board seal the redacted portions of Petitioner's Opposition to Patent Owner's Request for Discretionary Denial.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX PLLC

/Daniel S. Block/

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Date: November 4, 2025

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

I certify that the above-captioned **PETITIONER'S MOTION TO SEAL** was served in its entirety on November 4, 2025, upon the following parties via electronic mail:

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