

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

PATENT OWNER'S UPDATED EXHIBIT LIST

TABLE OF EXHIBITS

Exhibit No.	Description
2001	Declaration of W. Cook Alciati in Support of Motion for Admission <i>Pro Hac Vice</i> .
2002	A. Toth's Letter to Aon dated July 21, 2025.
2003	Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 10,529,029.
2004	Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 10,650,285.
2005	Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 11,195,058.
2006	Zesty.ai, Inc.'s Draft IPR Petition of U.S. Patent No. 11,030,491.
2007	[Filed under Seal] Email Exchange between A. Toth and C. Alciati.
2008	District Court's Memorandum in Support of its Order Denying Zesty.ai, Inc.'s Motion to Dismiss under 35 U.S.C. § 101, Case No. 1:25-cv-00201 (D. Del.).
2009	T. Okazaki & O. Gaspa Rebull, Aon Benfield, May 12, 2017 presentation entitled "More than Just a Big Idea: How big data and deep learning is helping Japanese insurers to protect homeowners from Nat Cat risk?"
2010	Declaration of Dan Dick.
2011	[Filed under Seal] Email Exchange between C. Alciati and G. Sueoka re Aon/Zesty (2020).
2012	Aon Re, Inc.'s Notice Letter to Zesty.ai, Inc. dated April 20, 2023.
2013	Zesty.ai, Inc.'s Opening Brief in Support of its Motion to Dismiss under 35 U.S.C. § 101, Case No. 1:25-cv-00201 (D. Del.).
2014	Zesty.ai, Inc.'s Reply Brief in Support of its Motion to Dismiss under 35 U.S.C. § 101, Case No. 1:25-cv-00201 (D. Del.).
2015	District Court's Scheduling Order, Case No. 1:25-cv-00201 (D. Del.).
2016	K. Oussayef's email to C. Alciati dated July 21, 2025 re Zesty.ai, Inc.'s Draft IPRs.
2017	[Filed under Seal] Email Exchange between D. Dick and A. Toth dated April 25, 2023.
2018	IPR2025-01358, Declaration of Dr. David A. Forsyth in Support of Zesty.ai, Inc.'s IPR Petition of U.S. Patent No. 10,529,029.
2019	IPR2025-01357, Declaration of Dr. David A. Forsyth in Support of Zesty.ai, Inc.'s IPR Petition of U.S. Patent No. 10,650,285.

Exhibit No.	Description
2020	IPR2025-01357, Zesty.ai, Inc.'s IPR Petition of U.S. Patent No. 10,650,285.
2021	Declaration of W. Cook Alciati in Support of Patent Owner's Discretionary Denial Request.
2022	LinkedIn profile page of J. Nicholas Gross.
2023	IPR2025-01359, Zesty.ai, Inc.'s IPR Petition of U.S. Patent No. 11,195,058.
2024	[Filed under Seal] Marketing Agreement dated April 19, 2021 between Aon and Zesty.ai, Inc.
2025	U.S. Patent Application Publication No. 2017/0193297 to Michini et al.

Dated: November 17, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing PATENT OWNER'S UPDATED EXHIBIT LIST was served in its entirety by filing the document through the Patent Trial and Appeal Case Tracking System (P-TACTS) as well as providing a courtesy copy via e-mail to the following attorneys of record for the Petitioner listed below:

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