

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANADIAN SOLAR INC.,
Petitioner,

v.

MAXEON SOLAR PTE. LTD.,
Patent Owner.

IPR2024-01038¹
Patent No. 11,251,315

PETITIONER'S NOTICE OF OBJECTIONS TO EVIDENCE

¹ IPR2024-01194 has been consolidated with the instant proceeding.

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioner Canadian Solar Inc. hereby submits their notice of objections to certain evidence that Patent Owner Maxeon Solar Pte. Ltd. submitted with its Patent Owner Response (Paper No. 30) on April 8, 2025 in connection with IPR2024-01038.

Exhibit Number	Objection(s)
Ex. 2028	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 801-807: This exhibit is hearsay. The dates and other information within this document are used for the truth of the matter asserted. Patent Owner has not proven that this document is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. FRE 401, 402, 403: This exhibit is not relevant at least because the challenged claims do not require a particular level or concentration of metal impurities. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative.
Ex. 2029	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted. FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or supporting declarations or the Patent Owner Response or

	supporting declarations. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative evidence, and therefore the exhibit and any related testimony are inadmissible under Rule 403.
Ex. 2030	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted. FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or supporting declarations or the Patent Owner Response or supporting declarations. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative evidence, and therefore the exhibit and any related testimony are inadmissible under Rule 403.
Ex. 2031	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted. FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or supporting declarations or the Patent Owner Response or supporting declarations. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly

	presenting cumulative evidence, and therefore the exhibit and any related testimony are inadmissible under Rule 403.
Ex. 2032	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 801-807: This exhibit is hearsay. The dates and other information within this document are used for the truth of the matter asserted. Patent Owner has not proven that this document is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. FRE 401, 402, 403: This exhibit is not relevant at least because the challenged claims do not require a particular level or concentration of metal impurities. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative.
Ex. 2033	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 801-807: This exhibit is hearsay. The dates and other information within this document are used for the truth of the matter asserted. Patent Owner has not proven that this document is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. FRE 401, 402, 403: This exhibit is not relevant at least because the challenged claims do not require a particular level or concentration of metal impurities. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice,

	confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative.
Ex. 2034	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted. FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or supporting declarations or the Patent Owner Response or supporting declarations. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative evidence, and therefore the exhibit and any related testimony are inadmissible under Rule 403.
Ex. 2035	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted. FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or supporting declarations or the Patent Owner Response or supporting declarations. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative evidence, and therefore the exhibit and any related testimony are inadmissible under Rule 403.

Ex. 2036	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 801-807: This exhibit is hearsay. The dates and other information within this document are used for the truth of the matter asserted. Patent Owner has not proven that this document is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. FRE 401, 402, 403: This exhibit is not relevant at least because the challenged claims do not require a particular level or concentration of metal impurities. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative.
Ex. 2037	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 801-807: This exhibit is hearsay. The dates and other information within this document are used for the truth of the matter asserted. Patent Owner has not proven that this document is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. FRE 401, 402, 403: This exhibit is not relevant at least because the challenged claims do not require a particular level or concentration of metal impurities. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative.

Ex. 2038	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902. FRE 801-807: This exhibit is hearsay. The dates and other information within this document are used for the truth of the matter asserted. Patent Owner has not proven that this document is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. FRE 401, 402, 403: This exhibit is not relevant at least because the challenged claims do not require a particular level or concentration of metal impurities. To the extent it is relevant, its probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative.
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These objections are timely presented, as they are submitted and served within five business days of the filing of Patent Owner's Response. 37 C.F.R. § 42.64. Canadian Solar reserves the right to file a motion to exclude the evidence objected to herein.

Dated: April 15, 2025

Respectfully submitted,

/Samuel N. Tiu/
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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of April, 2025, the above-captioned
PETITIONER'S OBJECTIONS TO EVIDENCE been served in its entirety via
electronic mail:

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Bradford A. Cangro
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Jing Zhao
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