

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 B2

**PETITIONER'S MOTION
FOR PRO HAC VICE ADMISSION OF LEIF E. PETERSON, II**

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

Petitioner Canadian Solar Inc. (“CSI”) respectfully requests that the Board recognize Leif E. Peterson, II, Esq. as *pro hac vice* and as an associate agent of CSI’s counsel of record designated under its Power of Attorney (Paper 2) for CSI in this proceeding.

I. BACKGROUND

CSI’s Motion for *Pro Hac Vice* Admission is being filed pursuant to and in compliance with the Notice of Filing Date Accorded to Petition, which was filed July 15, 2024 (Paper 3) (the “Notice”). Patent Owner does not oppose this Motion.

II. TIME OF FILING

This Motion for *Pro Hac Vice* Admission is being filed in accordance with the Notice, and is filed greater than 21 days after service of the Petition.

III. STATEMENT OF FACTS

As required by the Order, the following statement of facts, supported by the attached Declaration of Leif E. Peterson, II in Support of Motion for *Pro Hac Vice* Admission (Ex. 1086, “Peterson Declaration”), shows that there is good cause for the Patent Trial and Appeal Board (“Board”) to recognize Mr. Peterson *pro hac vice* in this proceeding. As required by 37 C.F.R. § 42.10(c), CSI’s lead counsel, Samuel N. Tiu, is a registered practitioner and experienced in proceedings before the USPTO.

Mr. Peterson is an experienced litigation attorney. Mr. Peterson has been a litigating attorney for more than 10 years and has been involved in numerous patent litigation cases in federal courts. Mr. Peterson's experience includes representing a wide range of clients in complex intellectual property litigation, and he has appeared in a number of litigation matters before various Appellate and District Courts. Mr. Peterson previously appeared *pro hac vice* before the Board in *Apple Inc. v. MemoryWeb, LLC*, Case No. IPR2022-00031; *Merck Sharp & Dohme LLC v. Halozyme Inc.*, Case Nos. PGR2025-00003, PGR2025-00004, PGR2025-00006, PGR2025-00009, and PGR2025-00017.

Mr. Peterson is a member in good standing of the Illinois State Bar, with no suspensions or disbarments from practice, nor any application for admission to practice denied, nor any sanctions or contempt citations. Mr. Peterson is admitted to practice before the United States Court of Appeals for the Federal Circuit, the United States District Court for the Northern District of Illinois, and the United States District Court for the Western District of Michigan.

Mr. Peterson's mailing address is: Sidley Austin LLP, 1 South Dearborn, Chicago, IL 60603; his email address is: leif.peterson@sidley.com; and his direct dial is: (312) 853-7190.

Mr. Peterson has worked with lead counsel in connection with this proceeding. As such, he has reviewed and is familiar with (i) U.S. Patent No.

11,251,315, the patent at issue in this consolidated proceeding, (ii) the legal and factual arguments that have been put forth by Petitioner, and (iii) the developments in this proceeding since the filing of the Petition. Mr. Peterson has fully familiarized himself with the Board's established practices. Accordingly, he has established familiarity with the subject matter at issue in these proceedings and the conduct of these proceedings to date.

Mr. Peterson has read and will comply with the Office Patent Trial Practice Guide and the Board's Rules for Practice for Trials set forth in part 42 of 37 C.F.R., and he agrees to be subject to the USPTO Rules of Professional Conduct set forth in 37 C.F.R. §§ 11.01 *et seq.*, and to disciplinary jurisdiction under 37 C.F.R. § 11.19(a).

IV. ANALYSIS

The facts contained in the Statement of Facts above, and contained in the Peterson Declaration, establish that there is good cause to admit Mr. Peterson *pro hac vice* in this proceeding under 37 C.F.R. § 42.10(c). CSI's lead counsel is a registered practitioner, and Mr. Peterson is an experienced litigating attorney with an established familiarity with the subject matter at issue in this proceeding.

V. CONCLUSION

Therefore, Petitioner respectfully submits that there is good cause for the Board to recognize Mr. Peterson as *Pro Hac Vice* counsel and as an associate agent

for Petitioner during these proceedings. CSI's Motion for *Pro Hac Vice* Admission is accompanied by a Declaration of Leif E. Peterson, II, as required by the Order.

Dated: June 5, 2025

Respectfully submitted,

/Samuel N. Tiu/

Samuel N. Tiu

Reg. No. 47,997

Sidley Austin LLP

350 S. Grand Avenue

Los Angeles, CA 90071

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of June, 2025, a copy of the foregoing and accompanying exhibits, has been served in its entirety by electronic mail on the following counsel of record for patent owner:

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Dated: June 5, 2025

Respectfully submitted,

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