

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANADIAN SOLAR INC.,
Petitioner

v.

MAXEON SOLAR PTE. LTD.,
Patent Owner

Case IPR2024-01038¹
U.S. Patent No. 11,251,315

PATENT OWNER'S UPDATED EXHIBIT LIST

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

PATENT OWNER'S EXHIBIT LIST

Exhibit	Description
2001	Declaration of David Carroll, Ph.D. in Support of Patent Owner Preliminary Response
2002	<i>Intentionally Left Blank</i>
2003	<i>Intentionally Left Blank</i>
2004	Results charted from DocketNavigator.com Document Search, run on October 8, 2024, for Motion to Stay Pending <i>Inter Partes</i> Review Decided by Judge Rodney Gilstrap
2005	Results charted from DocketNavigator.com Document Search, run on October 8, 2024, for Motion to Stay Pending <i>Inter Partes</i> Review Decided by Judge Rodney Gilstrap with “Stipulated/Agreed” Motions Removed
2006	Federal Court Management Statistics (June 30, 2024)
2007	Order Denying Maxeon Partial Motion to Dismiss (Dkt. 26), <i>Maxeon Solar Pte. Ltd. v. Canadian Solar, Inc.</i> , Case No. 2:24-cv-00210-JRG (E.D. Tex.), July 3, 2024
2008	Docket Control Order (Dkt. No. 33), <i>Maxeon Solar Pte. Ltd. v. Canadian Solar, Inc.</i> , Case No. 2:24-cv-00210-JRG (E.D. Tex.), August 7, 2024
2009	Canadian Solar Inc.’s Invalidity Contentions, <i>Maxeon Solar Pte. Ltd. v. Canadian Solar, Inc.</i> , Case No. 2:24-cv-00210-JRG (E.D. Tex.), September 6, 2024
2010	<i>Intentionally Left Blank</i>
2011	<i>Intentionally Left Blank</i>
2012	<i>Intentionally Left Blank</i>
2013	<i>Intentionally Left Blank</i>
2014	<i>Intentionally Left Blank</i>

Exhibit	Description
2015	Granek et al., "Front surface passivation of n-type high-efficiency back junction silicon solar cells using front surface," <i>Solar Energy Materials and Solar Cells</i> , 91(7) (2007)
2016	"Nanotechnology improves solar cell efficiency," <i>EarthSky</i> , August 28, 2007 (accessible at https://earthsky.org/humanworld/nanotechnology-improves-solar-cell-efficiency ; last accessed October 14, 2024)
2017	"New Plastic Solar Cell Breaks Efficiency Record," <i>ScienceDaily</i> , April 20, 2007 (accessible at https://www.sciencedaily.com/releases/2007/04/070419140902.htm), last accessed October 14, 2024)
2018	Capshaw-Mack, C., "Power Games: Project seeks to improve methods of harnessing solar energy," <i>Winston-Salem Journal</i> , August 4, 2013 (accessible at https://journalnow.com/news/local/article_1d243ff0-fc9e-11e2-b607-001a4bcf6878.html ; last accessed October 15, 2024)
2019	<i>Intentionally Left Blank</i>
2020	Declaration of David L. Carroll, Ph.D. in Support of Patent Owner Preliminary Response for IPR2024-01194
2021	Declaration of David Carroll, Ph.D. in Support of Patent Owner Response for IPR2024-01038
2022	Transcript of deposition of Sanjay Banerjee, Ph.D. taken March 21, 2025
2023	Transcript of deposition of Sanjay Banerjee, Ph.D. taken March 20, 2025
2024	Lamers et al., "Towards 21% Efficient N-CZ IBC Based on Screen Printing," <i>26th European Photovoltaic Solar Energy Conference and Exhibition</i> , (2011) ("Lamers")
2025	Desa et al., "Optimization of p-type Screen Printed Interdigitated Back Contact Silicon Solar Cell with Aluminum Back Surface Field," <i>International Journal of Engineering & Technology IJET-IJENS</i> , 14(2) (2014) ("Desa")

Exhibit	Description
2026	Procel et al., “Analysis of the Impact of Doping Levels on Performance of Back Contact – Back Junction Solar Cells,” <i>4th International Conference on Silicon Photovoltaics, SiliconPV 2014</i> , Italy, 2014, pp 128-132, ScienceDirect (“Procel”)
2027	U.S. Patent No. 8,790,957 to Li et al.
2028	Schulz, M., “Interface States at the SiO ₂ -Si Interface,” <i>Surface Science</i> 132 (1983)
2029	Aoki, M., et al., “Intrinsic Gettering of Iron Impurities in Silicon Wafer,” <i>Japanese Journal of Applied Physics</i> , Vol. 30, No. 12B, pp. 3580-3583 (Dec. 1991)
2030	Ziebarth, B., et al., “Interstitial Iron Impurities at Grain Boundaries in Silicon: A First-Principles Study,” <i>Physical Review B</i> 91 (2015)
2031	Portavoce A., et al., “Redistribution of Metallic Impurities in Si During Annealing and Oxidation: W and Fe,” <i>Defect and Diffusion Forum</i> , Vol. 383, pp. 17-22 (2018)
2032	Hajjiah, A., et al., “The Impact of Interstitial Fe Contamination on N-Type Cz-Silicon for High Efficiency Solar Cells,” <i>Solar Energy Materials & Solar Cells</i> 211 (2020)
2033	Coletti, G., “Sensitivity of State-of-the-Art and High Efficiency Crystalline Silicon Solar Cells to Metal Impurities,” <i>Prog. Photovolt: Res. Appl.</i> 2013; 21:1163-1170 (2012)
2034	Castellanos S., et al., “Exceeding 3 ms Minority Carrier Lifetime in n-Type Non-Contact Crucible Silicon,” <i>Energy Procedia</i> 92, pp. 779-784 (2016)
2035	Sopori, B., “Impurities and Defects in Photovoltaic Si Devices: A Review,” <i>10th Int’l Workshop on the Physics of Semiconductor Devices</i> , Delhi, India, Dec. 13, 1999
2036	EAG Laboratories, “SIMS Detection Limits of Selected Elements in Si and SiO ₂ Under Normal Depth Profiling Conditions”
2037	Haarahiltunen, A., et al. “Detection of Iron Contamination in Internally Gettered P-Type Silicon Wafer by Lifetime Measurements”

Exhibit	Description
2038	Liu, A., et al, "Understanding the Impurity Gettering Effect of Polysilicon/Oxide Passivating Contact Structures Through Experiment and Simulation," <i>Solar Energy Materials and Solar Cells</i> 230 (2021)
2039	Declaration of Dr. Mary K. Bolin
2040 <i>New</i>	Patent Owner's Demonstratives

Respectfully submitted,

Date: October 9, 2025

/Jacob A. Snodgrass/

Jacob A. Snodgrass (Reg. No. 66,032)

*Counsel for Patent Owner Maxeon Solar
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CERTIFICATE OF SERVICE

I certify that the foregoing Patent Owner's Updated Exhibit List was served on Petitioner's counsel of record by electronic notification through P-TACTS and email to:

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