

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANADIAN SOLAR INC.,
Petitioner,

v.

MAXEON SOLAR PTE. LTD.,
Patent Owner.

IPR2024-01039
Patent No. 8,222,516

PETITIONER'S REQUEST FOR ORAL ARGUMENT

Pursuant to 37 C.F.R. § 42.70 and the Board's Scheduling Order (Paper 14), dated January 14, 2025, Petitioner Canadian Solar Inc. hereby respectfully requests oral argument in this proceeding on the grounds of unpatentability on which trial was instituted, and any additional issues on which the Board seeks clarification. The oral argument is currently scheduled for October 15, 2025. *See* Paper 14. Petitioner understands from an August 26, 2025 email from the Chief Clerk of the Board that oral argument will be held at the USPTO Rocky Mountain Regional Office in Denver, Colorado.

Petitioner has conferred with Patent Owner about argument time and structure. Petitioner respectfully requests (and Patent Owner agrees) that the issues in this proceeding should be heard together with IPR2024-01040, as the arguments are overlapping. Petitioner also respectfully requests (and Patent Owner agrees) that each side be given a total of one hour to present its arguments across both proceedings.

Petitioner proposes presenting its initial argument (up to 60 minutes), Patent Owner following with its response (up to 60 minutes), and Petitioner using any remaining time for rebuttal. Because Petitioner bears the ultimate burden of proof that the claims at issue in this review are unpatentable, Petitioner would oppose any request by Patent Owner for a sur-rebuttal.

Petitioner also respectfully requests permission to use audio/visual equipment to display demonstrative exhibits, for example, the use of a projector and screen that connects to a laptop computer.

Dated: August 29, 2025

Respectfully submitted,

/Samuel N. Tiu/
Samuel N. Tiu
Reg. No. 47,997
Sidley Austin LLP
350 S. Grand Avenue
Los Angeles, CA 90071

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August, 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:

Jeremy D. Peterson	jeremy.peterson@pvuslaw.com
Bradford A. Cangro	bradford.cangro@pvuslaw.com
Jacob A. Snodgrass	jacob.snodgrass@pvuslaw.com
Jing Zhao	jing.zhao@pvuslaw.com
	Maxeon_SolarIPRService@pvuslaw.com

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