

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

CANADIAN SOLAR INC.

Petitioner

v.

MAXEON SOLAR PTE. LTD.

Patent Owner

PTAB Case No. IPR2024-01040

Patent No. 8,878,053

PATENT OWNER'S NOTICE OF OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Maxeon Solar Pte. Ltd. ("Maxeon") hereby submits their notice of objections to certain evidence that Canadian Solar Inc. ("Petitioner") submitted with its Petition for *Inter Partes* Review ("Petition") (Paper No. 1) on June 24, 2024, in connection with IPR2024-01040.

Exhibit Number	Objection(s)
Ex. 1034	FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or any declarations to the Petition. 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 testimony is inadmissible under Rule 403. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted.
Ex. 1035	FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or any declarations to the Petition. 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 testimony is inadmissible under Rule 403. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted.
Ex. 1038	FRE 401, 402, 403: This exhibit is not relevant as it was not cited in the Petition or any declarations to the Petition. 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

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	cumulative evidence, and therefore the testimony is inadmissible under Rule 403. FRE 802: This exhibit is hearsay to the extent it is used for the truth of the matter asserted.
Ex. 1016	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1017	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1020	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1021	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902.

Exhibit Number	Objection(s)
	FRE 801-807: This exhibit is hearsay. The dates and other information within this exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1022	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1023	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1030	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1040	FRE 901, 902: This exhibit is objected to as not authenticated under FRE 901, and the document is not self-authenticating under FRE 902.

Exhibit Number	Objection(s)
	FRE 801-807: This exhibit is hearsay. The dates and other information within this exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1041	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1042	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.
Ex. 1049	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 exhibit are used for the truth of the matter asserted. Petitioner has not proven that this exhibit is prior art that was publicly available or otherwise relevant to this proceeding as of the priority date.

These objections are timely presented, as they are submitted and served within 10 business days of the institution of the trial. 37 C.F.R. § 42.64(b)(1). Maxeon reserves the right to file a motion to exclude the evidence objected to herein.

Dated: January 29, 2025

Respectfully submitted,

By: /Jeremy D. Peterson/

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*Counsel for Patent Owner Maxeon Solar
Pte. Ltd.*

CERTIFICATE OF SERVICE (37 C.F.R. § 42.6(e))

I certify that the above-captioned **PATENT OWNER'S NOTICE OF
OBJECTIONS TO EVIDENCE** was served in its entirety on January 29, 2025
upon the following parties via electronic mail:

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Date: January 29, 2025

/Jeremy D. Peterson/

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*Counsel for Patent Owner Maxeon
Solar Pte. Ltd.*