

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 No. IPR2024-01040
U.S. Patent No. 8,878,053

PATENT OWNER'S OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner Maxeon Solar Private Limited, ("Patent Owner") objects to the following evidence, submitted on July 1st, 2025, by Petitioner Canadian Solar Inc.'s ("Petitioner's") in Petitioner's Reply (Paper 32) to Patent Owner Response. Patent Owner submits its objections on July 9th, within five business days from July 1st, 2025, and reserves the right to file a motion to exclude the evidence objected to herein.

Exhibit Number	Objection(s)
Ex. 1077	FRE 801, 802: Exhibits 1077, 1078, 1079, and 1080 are hearsay to the extent they are used for the truth of the matter asserted, and the exceptions under FRE 803 do not apply.
Ex. 1078	
Ex. 1079	
Ex. 1080	
	FRE 401, 402, 403: Exhibits 1077, 1078, 1079, and 1080 lack relevance because their probative value of each exhibit is substantially outweighed by the dangers of unfair prejudice.
	FRE 901, 902: Exhibits 1077, 1078, 1079, and 1080 lack authentication and foundation, and are not self-authenticating under FRE 902. Petitioner has not produced sufficient evidence to support a finding that these exhibits are what Petitioner says they are.
Ex. 1082, ¶¶ 9, 10, 39, Appendix D	Paragraphs 9, 10, 39, and Appendix D of Exhibit 1082 cite Exhibit 1077, and therefore violate the same rules of evidence as Exhibit 1077 (stated above).
Ex. 1082, ¶ 14, Appendix D	Paragraph 14 and Appendix D of Exhibit 1082 cite Exhibit 1078, and therefore violate the same rules of evidence as Exhibit 1078 (stated above).
Ex. 1082, ¶39, Appendix D	Paragraph 39 and Appendix D of Exhibit 1082 cite Exhibit 1079, and therefore violate the same rules of evidence as Exhibit 1079 (stated above).

Patent Owner's Objections to Evidence

Case No. IPR2024-01040

U.S. Patent No. 8,878,053

Ex. 1082, ¶ 27, Appendix D	Paragraph 27 and Appendix D of Exhibit 1082 cite Exhibit 1080, and therefore violate the same rules of evidence as Exhibit 1080 (stated above).
Ex. 1082, ¶¶ 41-46	FRE 801, 802: Paragraphs 41 to 46 of Exhibit 1082 are hearsay to the extent they are used for the truth of the matter asserted, and the exceptions under FRE 803 do not apply.

Respectfully submitted,

Date: July 9, 2025

/Jeremy D. Peterson/

Jeremy D. Peterson (Reg. No. 52,115)

PV Law LLP

5335 Wisconsin Avenue, NW, Suite 440

Washington, DC 20015-2052

Telephone: 202.871.0140

Facsimile: 202.888.3163

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

CERTIFICATE OF SERVICE

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

Samuel N. Tiu, stiu@sidley.com

Joseph A. Micallef, jmicallef@sidley.com

Brooke S. Böll, brooke.boll@sidley.com

Sidley Austin LLP, Sidley_CSI_IRP@sidley.com

Date: July 9, 2025

/Jeremy D. Peterson/

Jeremy D. Peterson (Reg. No. 52,115)

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