**UNITED STATES PATENT AND TRADEMARK OFFICE**

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**BEFORE THE PATENT TRIAL AND APPEAL BOARD**

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CANADIAN SOLAR INC.,
Petitioner

v.

MAXEON SOLAR PTE. LTD.,
Patent Owner

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

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# PATENT OWNER'S REQUEST FOR ORAL ARGUMENT

Patent Owner Maxeon Solar Pte. Ltd. ("Patent Owner") hereby requests oral argument under 37 C.F.R. § 42.70. Per the Scheduling Order (Paper 14), oral argument is scheduled for October 15, 2025, and, per email from the Chief Clerk of the Board dated August 26, 2025, the hearing will be held at the USPTO Rocky Mountain Regional Office in Denver, Colorado.

Consolidation of Argument: Patent Owner requests that the oral argument for the following proceedings be merged and conducted as a single consolidated hearing:

1. IPR2024-01039 (U.S. Patent No. 8,222,516)
2. IPR2024-01040 (U.S. Patent No. 8,787,053)

The parties have conferred, and agree to consolidation.

Consolidation is appropriate for the two proceedings above because they include overlapping subject matter, are assigned the same administrative patent judges, share the same Scheduling Order, and are scheduled for oral argument on the same day. *See, e.g.*, *Hilti, Inc. v. Milwaukee Elec. Tool Corp.*, IPR2015-01164, Paper 55, 2 (PTAB July 13, 2016) (consolidating oral arguments for 3 IPR proceedings involving 3 patents); *Mylan Pharms. Inc. v. Sanofi-Aventis Deutschland GmbH*, IPR2017-01526, Paper 72 (PTAB Aug. 27, 2018) (consolidating oral arguments for 2 IPR proceedings involving 2 different patents); *Mangrove Partners Master Fund, Ltd. et al. v. VirnetX, Inc.*, IPR2015-01046,

Paper 60 (PTAB June 2, 2016) (consolidating oral arguments for 2 IPR proceedings involving 2 different patents).

Time: Patent Owner proposes that a total of 60 minutes be allotted to each side for oral argument in the two consolidated cases. The parties have conferred, and agree to this time.

Patent Owner further requests an opportunity to reserve sur-rebuttal time to respond to rebuttal arguments by Petitioner, and an opportunity to provide a closing statement. *Mangrove*, supra, at 2 ("Both parties may reserve some of their argument time for rebuttal, and Patent Owner will be afforded an opportunity to provide a closing statement along with any rebuttal.").

Issues for Argument: Without waiving any issue not specifically identified, Patent Owner specifies at least the following issues it may discuss at argument:

1. Issues related to the instituted grounds, including obviousness, motivation to combine, and reasonable expectation of success;
2. The timeliness of the arguments raised in the proceedings;
3. Any other relevant issues raised in papers filed in this proceedings; and
4. Any other issue on which the Board wishes to receive argument.

Respectfully submitted,

Date: August 29, 2025

*/Jeremy D. Peterson/*

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

## CERTIFICATE OF SERVICE

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

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Date: August 29, 2025

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