UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

HANWHA SOLUTIONS CORPORATION,

Petitioner,

v.

MAXEON SOLAR PTE. LTD.,

Patent Owner.

Case No. IPR2024-01198

U.S. Patent No. 11,251,315

PETITIONER'S UPDATED MANDATORY NOTICES

Pursuant to 37 C.F.R. § 42.8(a)(3), Petitioner Hanwha Solutions Corporation ("Petitioner") hereby updates its Mandatory Notices. The Mandatory Notices are revised to reflect the status of the related matters.

Concise statement of update: REC has filed IPR2025-00592 (challenging claims in the '516 patent), IPR2025-00593 (challenging claims in the '053 patent), and IPR2025-00594, -0595 (challenging claims in the '315 patent). REC has requested joinder with corresponding IPRs filed by Canadian Solar Inc. ("CSI").

On February 19, 2025, REC filed a motion to stay Patent Owner's above-referenced litigation against REC following institution of each IPR petition filed by CSI. *See* ECF No. 36, Defendant REC Solar Holdings As' Opposed Motion To Stay, No. 2:24-cv-00260-JRG (E.D. Tex.). REC's motion remains pending. With REC's filing of a motion to stay, all district court proceedings involving the challenged patents have a pending motion to stay.

I. RELATED MATTERS

A. Petition (August 8, 2024)

Pursuant to 37 C.F.R. §42.8(b)(2), Petitioner discloses that Patent Owner has asserted U.S. Patent Nos. 8,222,516 ("'516 patent"), 8,878,053 ("'053 patent"), and 11,251,315 ("'315 patent") against Petitioner in *Maxeon Solar Pte. Ltd. v. Hanwha Solutions Corporation and Hanwha Energy Corporation*, No. 2:24-cv-00262 (E.D. Tex.). Ex.1005-Complaint.

Patent Owner has also asserted these patents in the following proceedings:

- *Maxeon Solar Pte. Ltd. v. Canadian Solar Inc.*, No. 2:24-cv-00210 (E.D. Tex.); and
- *Maxeon Solar Pte. Ltd. v. REC Solar Holdings AS*, No. 2:24-cv-00260 (E.D. Tex.).

On June 24, June 25, and July 19, 2024, Canadian Solar Incorporated ("CSI") filed *inter partes* review ("IPR") petitions challenging a subset of claims of the '516, '053, and '315 patents:

Challenged Patent	Challenged Claims	Case No.
8,222,516	9-12	IPR2024-01039
8,878,053	9-20	IPR2024-01040
11,251,315	10-15 16, 19	IPR2024-01038 IPR2024-01194

Petitioner is concurrently filing IPR petitions challenging all claims of the '516 and '053 patents:

Challenged Patent	Challenged Claims	Case No.
8,222,516	1-12	IPR2024-01203
8,878,053	1-20	IPR2024-01199

B. Updated Related Matters (February 11, 2025)

On January 31, 2025, CSI filed a motion to stay Patent Owner's above referenced litigation against CSI following institution of each IPR petition filed by CSI. *See* ECF No. 49, Canadian Solar Inc.'s Motion to Stay Pending *Inter Partes* Review, *Maxeon Solar Pte. Ltd. v. Canadian Solar Inc.*, No. 2:24-cv-00210 (E.D. Tex.). CSI's motion remains pending.

On February 5, 2025, Petitioner filed a motion to stay Patent Owner's above referenced litigation against Petitioner following institution of each IPR petition filed by CSI. Petitioner also informed the district court that the decisions on institution were due prior to March 1, 2025. *See* ECF No. DI41, Defendants Hanwha Solutions Corporation and Hanwha Energy Corporation's Opposed Motion to Stay Pending Resolution of *Inter Partes* Review of All Asserted Claims, *Maxeon Solar Pte. Ltd. v. Hanwha Solutions Corporation and Hanwha Energy Corporation*, No. 2:24-cv-00262 (E.D. Tex.). Petitioner's motion remains pending.

C. Updated Related Matters (February 21, 2025)

On February 14, 2025, REC filed IPR petitions challenging a subset of claims of the '516, '053, and '315 patents. The REC petitions request joinder with the corresponding CSI IPR petitions listed below:

Challenged Patent	Challenged Claims	REC Case No.	CSI Case No.
8,222,516	9-12	IPR2025-00592	IPR2024-01039
8,878,053	9-20	IPR2025-00593	IPR2024-01040
11,251,315	10-15 16, 19	IPR2025-00594 IPR2024-00595	IPR2024-01038 IPR2024-01194

On February 19, 2025, REC filed a motion to stay PO above-referenced litigation against REC following institution of each IPR petition filed by CSI. *See* ECF No. 36, Defendant REC Solar Holdings As' Opposed Motion To Stay, No. 2:24-cv-00260-JRG (E.D. Tex.). REC's motion remains pending.

With REC's filing of a motion to stay, each district court litigation has a motion to stay pending.

February 21, 2025

Respectfully submitted,
By: /David L. Cavanaugh/
David L. Cavanaugh
Reg. No. 36,476

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that, on February 21, 2025, I caused a true and correct copy of the following materials:

- Petitioner's Updated Mandatory Notices

to be served via electronic service on the counsel of record for Patent Owner:

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