

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 IPR2024-01198
U.S. Patent No. 11,251,315

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 its notice of objections to certain evidence that Petitioner Hanwha Solutions Corporation (“Petitioner”) submitted during the preliminary proceeding in this matter, including with its Petition for *Inter Partes* Review (“Petition”) (Paper No. 3) on August 8, 2024, concerning U.S. Patent No. 11,251,315 (“the ’315 patent”).

Exhibit	Objection(s)
Ex. 1016	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the ’315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1018	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the ’315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1019	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice

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Ex. 1020	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1021	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1022	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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	FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1023	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1024	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1025	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1026	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1027	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1028	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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	FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1031	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1033	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1034	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1040	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1041	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1042	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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	FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1043	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1044	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1046	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1047	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1048	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1049	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1051	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1052	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1053	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1054	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1057	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1058	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1059	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1060	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1061	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1062	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1064	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1072	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1073	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1074	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1075	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1077	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1078	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1081	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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Ex. 1082	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1083	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding. FRE 802: This exhibit is hearsay to the extent that the dates and other information within this exhibit are used in an attempt to prove the truth of the matter asserted. FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1084	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because Petitioner has not proven that this exhibit is prior art to the '315 patent or otherwise relevant to this proceeding.

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These objections are timely presented, as they are submitted and served within 10 business days of 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.

Respectfully submitted,

Date: March 11, 2025

/Jacob A. Snodgrass/

Jacob A. Snodgrass (Reg. No. 66,032)
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Washington, DC 20015-2052
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Facsimile: 202.888.3163

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

CERTIFICATE OF SERVICE

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

David Cavanaugh (David.Cavanaugh@wilmerhale.com)
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Gilbert Smolenski (Gilbert.Smolenski@wilmerhale.com)
WHMaxeonIPRService@wilmerhale.com

Date: March 11, 2025

/Jacob A. Snodgrass/

Jacob A. Snodgrass (Reg. No. 66,032)

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Solar Pte. Ltd.*