

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 OBJECTIONS TO EVIDENCE
SUBMITTED PRIOR TO INSTITUTION**

Petitioner Hanwha Solutions Corporation objects to the following evidence that Patent Owner Maxeon Solar Pte. Ltd. submitted prior to institution of the above-captioned proceeding. In accordance with 37 C.F.R. § 42.64(b)(1), these objections are being timely filed within ten (10) business days of institution of the trial on February 26, 2025.

A. Exhibits 2002-2005 and 2016-2018

Petitioner objects to Exhibits 2002-2005 and Exhibits 2016-2018 as hearsay under Federal Rules of Evidence 801, 802, and 803 to the extent that Patent Owner attempts to use Exhibits 2002-2005 and 2016-2018 for the truth of the matters asserted therein.

Petitioner also objects to Exhibits 2002-2005 and Exhibits 2016-2018 under FRE 401, 402, and 403 as lacking relevance and because their probative value is substantially outweighed by the dangers of unfair prejudice, confusing the issues, misleading the fact finder, undue delay, wasting time, and/or needlessly presenting cumulative evidence.

Petitioner further objects to Exhibits 2002-2005 and 2016-2018 under FRE 901 because these exhibits lack authentication and foundation. Exhibits 2002-2005 and 2016-2018 are also not self-authenticating under FRE 902, and Patent Owner has not produced evidence sufficient to support a finding that Exhibits 2002-2005

and 2016-2018 are what Patent Owner says they are.

B. Exhibits 2006 and 2021-2024

Petitioner objects to Exhibits 2006 and 2021-2024 under FRE 401, 402, and 403 as lacking relevance and because their probative value is substantially outweighed by the dangers of unfair prejudice, confusing the issues, misleading the fact finder, undue delay, wasting time, and/or needlessly presenting cumulative evidence.

Date: March 11, 2025

Respectfully submitted,

By: /David L. Cavanaugh/

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CERTIFICATE OF SERVICE

I hereby certify that, on March 11, 2025, I caused a true and correct copy of the following materials:

- Petitioner's Objections to Evidence Submitted Prior to Institution
- to be served via electronic service on the counsel of record for Patent Owner:

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