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 UNDER 37 C.F.R. § 42.64

Pursuant to 37 C.F.R. § 42.64, Petitioner Hanwha Solutions Corporation ("Petitioner") submits the following objections to evidence served with Patent Owner's Response on May 22, 2025. Petitioner's objections apply equally to Patent Owner's reliance on these exhibits in any subsequently-filed documents. These objections are timely, having been filed within five business days of Patent Owner serving the evidence. *See* 37 C.F.R. § 42.64(b)(1).

A. Exhibit 2028

Petitioner objects to Exhibit 2028 under Federal Rules of Evidence ("FRE") 702 because the opinions contained therein are conclusory and lack sufficient explanation. The opinions are not based on sufficient facts or data and are not the product of reliable principles and methods reliably applied to the facts of the case. *See* 37 C.F.R. § 42.65. To the extent that Exhibit 2028 purports to provide legal conclusions, Petitioner objects under FRE 702.

B. Exhibits 2030, 2031, 2033-2036, and 2038

Petitioner objects to Exhibits 2030, 2031, 2033-2036, and 2038 as hearsay under Federal Rules of Evidence 801, 802, and 803 to the extent that Patent Owner attempts to use Exhibits 2030, 2031, 2033-2036, and 2038 for the truth of the matters asserted therein.

Petitioner also objects to Exhibits 2030, 2031, 2033-2036, and 2038 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 2030, 2031, 2033-2036, and 2038 under FRE 901 because these exhibits lack authentication and foundation. Exhibits 2030, 2031, 2033-2036, and 2038 are also not self-authenticating under FRE 902, and Patent Owner has not produced evidence sufficient to support a finding that Exhibits 2030, 2031, 2033-2036, and 2038 are what Patent Owner says they are.

C. Exhibit 2037

Petitioner preserves and restates its objections to specific portions of Dr. Holman's cross-examination testimony taken during the deposition on May 1, 2025. To the extent Patent Owner has relied or will rely on portions of the testimony that were objected to during the deposition, Petitioner maintains those objections and the grounds for such objections. Petitioner also reserves the right to serve an errata for Dr. Holman's deposition transcript, and object to portions of the transcript on which Patent Owner relies that are subject to the errata.

D. Exhibit 2039

Petitioner objects to Exhibit 2039 under FRE 702 because the opinions contained therein are conclusory and lack sufficient explanation. The opinions are not based on sufficient facts or data and are not the product of reliable principles and methods reliably applied to the facts of the case. *See* 37 C.F.R. § 42.65. To the extent that Exhibit 2039 purports to provide legal conclusions, Petitioner objects under FRE 702.

Date: May 30, 2025

Respectfully submitted,

By: /David L. Cavanaugh/

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CERTIFICATE OF SERVICE

I hereby certify that, on May 30, 2025, I caused a true and correct copy of the following materials:

- Petitioner's Objections to Evidence Under 37 C.F.R. § 42.64

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

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