

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 with its Reply
(Paper No. 36) on August 14, 2025, concerning U.S. Patent No. 11,251,315 (“the
'315 patent”).

Exhibit	Objection(s)
Ex. 1090	FRE 106: This exhibit is incomplete because Hanwha did not include Dr. Schubert's errata. Hanwha was served with that errata on August 6, 2025, eight days before submitting the exhibit (without the errata).
Ex. 1091	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because the declaration of Dr. Carroll was provided in a separate proceeding with different grounds at issue. FRE 802: This exhibit is hearsay as to this proceeding. Dr. Carroll was not unavailable for his deposition in this proceeding.
Ex. 1092	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because the deposition of Dr. Carroll was taken in a separate proceeding with different grounds at issue. FRE 802: This exhibit is hearsay as to this proceeding. Dr. Carroll was not unavailable for his deposition in this proceeding.
Ex. 1093	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.

Exhibit	Objection(s)
	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1094	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. 1095	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. 1096	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1097	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. 1100	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. 1103	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1104	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. 1107	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. 1108	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1111	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. 1112	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. 1113	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.

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Ex. 1114	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. 1115	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. 1116	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1118	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. 1119	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. 1120	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1121	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. 1122	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. 1124	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.

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Ex. 1125	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. 1126	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. 1127	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.

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Ex. 1128	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. 1129	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. 1130	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1131	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.
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Ex. 1135	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.

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	FRE 901, 902: This exhibit has not been authenticated under FRE 901, and the exhibit is not self-authenticating under FRE 902.
Ex. 1136	FRE 402, 403: This exhibit is not relevant or, alternatively, any relevance is outweighed by the potential for unfair prejudice because the deposition of Dr. Ruby was taken in separate proceedings concerning patents other than the '315 patent and with different grounds at issue. FRE 802: This exhibit is hearsay as to this proceeding. If Petitioner believed that Dr. Ruby had discoverable knowledge relevant to this proceeding, Dr. Ruby was not unavailable for his deposition in this proceeding.
Ex. 1137	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. 1138	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.

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Ex. 1139	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.

These objections are timely presented as they are filed within five business days of service of the above-identified evidence. 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: August 21, 2025

/Jacob A. Snodgrass/

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

*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)
Mark Selwyn (Mark.Selwyn@wilmerhale.com)
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WHMaxeonIPRService@wilmerhale.com

Date: August 21, 2025

/Jacob A. Snodgrass/

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

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