

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 REQUEST FOR ORAL ARGUMENT

Pursuant to the Board's February 26, 2025 Scheduling Order (Paper No. 18), Petitioner Hanwha Solutions Corporation ("Petitioner") respectfully requests oral argument, as currently scheduled on December 3, 2025.¹ Petitioner requests the ability to use a computer, projector, and screen to display demonstratives and exhibits.

Petitioner requests that each side be allotted sixty (60) minutes in total to present arguments in this proceeding.

Pursuant to 37 C.F.R. § 42.70, Petitioner specifies the following issues to be argued:

- Issues related to the Board's Decision on Institution (Paper No. 17) and the grounds instituted in the Decision;
- Whether claims 10-17 and 19-20 are unpatentable under 35 U.S.C. § 103 as being obvious over Choi, Granek or Marvin, and Istratov;
- Whether claim 18 is unpatentable under 35 U.S.C. § 103 as being obvious over Choi, Granek or Marvin, Istratov, and Smith;

¹ Pursuant to the USPTO's July 23, 2025 notice, Petitioner understands that the hearing will be conducted in-person at a USPTO location. See <https://www.uspto.gov/about-us/news-updates/uspto-returning-person-ptab-hearings>. To the extent required, Petitioner requests that the oral argument be conducted in-person.

- Whether claims 10-15 are unpatentable under 35 U.S.C. § 103 as being obvious over Cousins, Granek or Marvin, and Istratov;
- Reply to any arguments raised in the Patent Owner Response (Paper 29) and Patent Owner's Sur-Reply to Petitioners' Reply (Paper 41);
- Respond to any issues specified by Patent Owner in its request for oral argument;
- Any arguments or additional issues raised by either party in a request for oral argument, motion to strike (if any), motion to exclude (if any), or any other motion, paper, opposition, response, reply, or sur-reply filed by either party before oral argument; and
- Any other outstanding motions and pleadings, and other issues that the Board deems necessary for issuing a Final Written Decision.

Petitioner also informs the Board that it anticipates that more than five individuals, including counsel, will attend the argument on its behalf.

Respectfully submitted,

Date: October 16, 2025

By: David L. Cavanaugh/
David L. Cavanaugh
Registration No. 36,476

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that, on October 16, 2025, I caused a true and correct copy
of the following materials:

- Petitioner's Request for Oral Argument

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

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