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. IPR2024-01199

U.S. Patent No. 8,878,053

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.

A. Exhibit 2026

Petitioner objects to Exhibit 2026 under Federal Rule 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 2026 purports to provide legal conclusions, Petitioner objects under FRE 702.

B. Exhibit 2027

Petitioner objects to Exhibit 2027 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 2027 purports to provide legal conclusions, Petitioner objects under FRE 702.

C. Exhibit 2029

Petitioner preserves and restates its objections to specific portions of Dr. Holman's cross-examination testimony taken during the deposition on May 8, 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.

Dated: May 30, 2025

Respectfully submitted,
By: /David L. Cavanaugh/
David L. Cavanaugh
Reg. No. 36,476

Counsel for Petitioner

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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