

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 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 and Patent Owner have conferred about argument time and structure. Petitioner and Patent Owner respectfully request a joint argument in IPR2024-01203 and IPR2024-01199 due to overlapping arguments between the two proceedings. Petitioner and Patent Owner also jointly request that each side be allotted sixty (60) minutes in total to present arguments across both proceedings.

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 9-12, 14, and 16-20 are unpatentable under 35 U.S.C. § 103 as being obvious over Froitzheim and Gan;

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 1-20 are unpatentable under 35 U.S.C. § 103 as being obvious over Froitzheim, Gan, and Smith;
- Whether claims 9-20 are unpatentable under 35 U.S.C. § 103 as being obvious over Li, Gan, and Smith;
- Reply to any arguments raised in the Patent Owner Response (Paper 29) or Patent Owner's Sur-Reply to Petitioners' Reply (Paper 40);
- 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.

IPR2024-01199
U.S. Patent No. 8,878,053
Petitioner's Request for Oral Argument

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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