

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 OPPOSITION TO PATENT OWNER'S
MOTION TO EXCLUDE**

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I. INTRODUCTION

Maxeon Solar's ("Maxeon") Motion to Exclude ("Motion") should be denied.

The Petition was supported by extensive evidence demonstrating the obviousness of the challenged claims, including Dr. Holman's testimony and multiple corroborating references. Petitioner's Reply further explained how Maxeon's Patent Owner Response ("POR") and the testimony of its expert Dr. Ruby confirmed the obviousness of the challenged claims. Petitioner's Reply also included additional auxiliary exhibits that were either introduced at Dr. Ruby's deposition or used to corroborate Dr. Holman's testimony in his reply declaration (Ex.1077).

Maxeon's Motion does not challenge the Petition's supporting evidence or Dr. Holman's testimony.¹ Instead, Maxeon resorts to raising meritless challenges to the auxiliary references submitted with the Petitioner's Reply. Maxeon's Motion not only misstates the undisputed record evidence but also mischaracterizes Petitioner's reliance on the challenged evidence and advances legally incorrect arguments.

First, Maxeon objects to the submission of Dr. Ruby's deposition testimony from a related proceeding (Ex.1071)—which was introduced as an exhibit during Dr. Ruby's deposition in this proceeding—as hearsay. But Petitioner does not rely

¹ Maxeon did not cross-examine Dr. Holman on his reply declaration (Ex.1077).

on this deposition testimony (including for the truth of the matter asserted) and instead submitted Ex.1071 to provide the full scope of Dr. Ruby's deposition testimony in this proceeding.

Second, Maxeon objects to multiple exhibits as unauthenticated hearsay. Maxeon's contentions ignore that Petitioner submitted an unchallenged declaration establishing the authenticity of the challenged references. Regardless, whether these references were publicly available misunderstands their use in this proceeding, which is simply to corroborate the testimony of Dr. Holman (or in one case for completeness because of its use at Dr. Ruby's deposition). None of the challenged exhibits are hearsay because the exhibits are offered as evidence of what they describe, and not for the truth of the matters asserted. And in any event, experts are permitted to rely on hearsay to support their opinions under FRE 703.

Petitioner respectfully suggests that the challenged claims should be evaluated on the basis of a complete record, and that Maxeon's Motion should be denied in its entirety.

II. LEGAL STANDARD

The Consolidated Trial Practice Guide sets forth the type of relief that can be requested in a motion to exclude:

A motion to exclude must explain why the evidence is not admissible (e.g., relevance or hearsay) but may not be used

to challenge the sufficiency of the evidence to prove a particular fact. A motion to exclude is not a vehicle for addressing the weight to be given evidence—arguments regarding weight should appear only in the merits documents. Nor should a motion to exclude address arguments or evidence that a party believes exceeds the proper scope of reply or sur-reply.

Pat. Trial & Appeal Bd. Consol. Prac. Guide § II.K (last visited Nov. 10, 2025), available at <https://www.uspto.gov/patents/ptab/trial-practice-guide>. “Patent Owner, as the moving party, bears the burden of establishing that it is entitled to the requested relief.” *Intuitive Surgical, Inc. v. P Tech, LLC*, IPR2020-00650, Paper 33 at 40 (P.T.A.B. Sept. 8, 2021) (citing 37 C.F.R. §§42.20(c), 42.62(a)).

III. ARGUMENT

A. Exhibit 1071 Should Not Be Excluded

Exhibit 1071 is Dr. Ruby's deposition transcript from *Canadian Solar, Inc. v. Maxeon Solar Pte, Ltd.*, IPR2024-01039, IPR2024-1040. Petitioner questioned Dr. Ruby about his prior testimony at his deposition for this proceeding (Ex.1075-Ruby-Tr., 21:4-22:9), and Petitioner filed all deposition exhibits in this proceeding for completeness. As a result, Exhibit 1071 is relevant to the patentability of the challenged claims.

Nonetheless, Maxeon seeks to exclude Exhibit 1071 for the apparent purpose of suggesting that “Petitioner is apparently displeased with the evidence that was obtained during this proceeding.” Mot., 3. Besides being an improper basis to move

for exclusion, it is also incorrect. Contrary to Maxeon's suggestion, Petitioner does not rely on Exhibit 1071 to fill evidentiary gaps in the record. In fact, Petitioner does not cite Exhibit 1071 in its Petitioner's Reply, and Dr. Holman does not cite Exhibit 1071 in his reply declaration (*see* Ex.1077-Reply-Decl.). Hanwha's positions are supported with ample evidence, including Dr. Holman's testimony (*e.g.*, Ex.1003-Decl.; Ex.1077-Reply-Decl.) that is supported by extensive literature and Dr. Ruby's deposition testimony (Ex.1075-Ruby-Tr.) from this proceeding.

Exhibit 1071 is also not hearsay. Petitioner introduced Exhibit 1071 as evidence of what it describes, and not for the truth of its content. Fed. R. Evid. 801(c) 1972 Adv. Comm. Note ("If the significance of an offered statement lies solely in the fact that it was made, no issue is raised as to the truth of anything asserted, and the statement is not hearsay."). Because Exhibit 1071 is not hearsay, it is immaterial whether any hearsay exception applies.²

² Exhibit 1071 does not resemble the exhibits excluded in Maxeon's cited cases. Mot., 3-5. In those cases, the excluded testimony from other proceedings was relied on for the truth of the matter asserted. *See Asetek Danmark A/S v. Coolit Sys., Inc.*, IPR2020-00825, Paper 50 at 43 (P.T.A.B. Oct. 12, 2021); *Unified Pats. Inc. v. Sound View Innovations, LLC*, IPR2018-00599, Paper 50 at 50 (P.T.A.B. Sept. 9, 2019);

B. The Remaining Challenged Exhibits Should Not be Excluded

Maxeon's remaining challenges to Exhibits 1072, 1074, 1078, 1079, 1080, 1085, and 1086 (collectively "Additional Challenged Exhibits") as irrelevant and unauthenticated hearsay are equally without merit. Mot., 5-11.

These auxiliary exhibits corroborate Dr. Holman's testimony or were used during Dr. Ruby's deposition. These exhibits are not relied on as themselves being pieces of prior art, and it is therefore immaterial whether they were publicly available. Exhibit 1072 was an exhibit at Dr. Ruby's deposition and was submitted as Exhibit 1072 for completeness.

The Additional Challenged Exhibits are indisputably relevant. Exhibit 1072 contains relevant information about the importance of reducing the number of processing steps in solar cell manufacturing. Exhibit 1074 provides relevant information about the use of APCVD on the front and rear sides of a cell with front and back metal contacts. Ex.1074, 172-173. Exhibit 1078 provides relevant

ABS Glob., Inc. v. XY, LLC, IPR2018-01224, Paper 28 at 18 (P.T.A.B. Dec. 9, 2018); *Google Inc. v. Intell. Ventures II LLC*, IPR2014-00787, Paper 91 at 20 (P.T.A.B. July 24, 2020); *Kirk v. Raymark Indus., Inc.*, 61 F.3d 147, 163 (3d Cir. 1995) (assuming statement from prior proceeding was relied on for truth of matter asserted).

information about tunnel oxides in early metal-insulator-semiconductor solar cells and the oxidation processes used to fabricate tunnel oxide layers in such cells. Ex.1078, 1308, 1310-1311. Exhibit 1079 provides relevant information about the use of tunnel oxides and polysilicon emitters in solar cells. Ex.1079, 1375. Exhibit 1080 provides relevant information about solar cells with thin tunnel oxides. Ex.1080, 283-84. Exhibit 1085 provides relevant information about modeling for solar cells. Ex.1085, 3.7, 4.6-4.7, 5.3, 7.6-7.8. Exhibit 1086 provides relevant information about polysilicon emitters. Ex.1086, 3-4.

The authenticity and availability of the Additional Challenged Exhibits are supported by Mr. Smolenski's declaration. Ex.1089, ¶¶3-7, 9, 11-13. Maxeon identifies no basis to challenge the representations in Mr. Smolenski's declaration. Maxeon chose not to depose Mr. Smolenski about the contents of his declaration, which explains in detail how the Additional Challenged Exhibits were obtained and attests to their authenticity. There is no countervailing evidence in the record. *See Costar Realty Info., Inc. v. Clantech, Inc.*, IPR2022-00799, Paper 77 at 54-55 (P.T.A.B. Nov. 21, 2023) (holding that attorney declarations were sufficient to authenticate exhibits). Nor does Maxeon identify any reason why the Additional Challenged Exhibits are not reliable from the face of the documents. *See Hulu, LLC v. Sound View Innovations, LLC*, IPR2018-01039, Paper 29 at 17-18 (P.T.A.B. Dec.

20, 2019) (precedential) (“[T]he indicia on the face of a reference, such as printed dates and stamps, are considered as part of the totality of the evidence.”) (citation omitted); *see also Nobel Biocare Servs. AG v. Intradent USA, Inc.*, 903 F.3d 1365, 1376 (Fed. Cir. 2018), as amended (Sept. 20, 2018) (“Although the [publication’s] date is not dispositive of the date of public accessibility, its date is relevant evidence that supports the Board’s finding of public accessibility at [a conference].”).

Further, the Additional Challenged Exhibits are not hearsay because they are being offered as evidence of what they describe, and not for the truth of the matters asserted. *See Grunenthal GmbH v. Antecip Bioventures II LLC*, PGR2019-00026, Paper 24 at 45-47 (P.T.A.B. July 28, 2020) (rejecting hearsay objection and finding statement regarding copyright date admissible as evidence of publication date).³

Alternatively, to the extent that the publication information within Additional Challenged Exhibits is deemed hearsay, that information is the most probative

³ Maxeon’s cited cases (*e.g.*, Mot., 7-8) are inapposite because they concern whether the weight of the evidence established public availability, a question that goes to the sufficiency of evidence rather than admissibility. *Open Text S.A. v. Box, Inc.*, Case No. 13-cv-04910-JD, 2015 WL 4940798 (N.D. Cal. Aug. 19, 2015); *Hilgraeve, Inc. v. Symantex Corp.*, 271 F. Supp. 2d 964 (E.D. Mich. 2003).

source for time of publishing and thus is admissible under Fed. R. Evid. 807. *See Grunenthal*, PGR2019-00026, Paper 24 at 46 (quoting Fed. R. Evid. 807(a)(2)) (“We find that [the reference’s] statement, indicating that [it] was published in October 2011, is ‘more probative on the point for which it is offered than any other evidence that the proponent can obtain through reasonable efforts.’”). In addition, to the extent they are hearsay, Exhibit 1074, Exhibit 1078, Exhibit 1079, Exhibit 1080, and Exhibit 1086 are subject to the ancient documents exception. That is, even if these documents were relied on for the truth of a matter asserted therein (they are not), they are not hearsay because they were prepared before January 1, 1998 and there are no genuine disputes about their authenticity. Fed. R. Evid. 803(16) (“[a] statement in a document that was prepared before January 1, 1998, and whose authenticity is established” is “not excluded by the rule against hearsay”). Lastly, to the extent that the Additional Challenged Exhibits are hearsay (they are not), they may still be relied on by Dr. Holman in forming his opinions. *See* Fed. R. Evid. 703; *Casper Sleep Inc. v. Werner Media Partners, LLC*, IPR2024-00474, Paper 60 at 80 (P.T.A.B. Apr. 24, 2025) (“For other evidence Patent Owner seeks to exclude, we find it, like those materials addressed in Petitioner’s Motion, to be materials considered by Petitioner’s expert witnesses in forming their conclusions and opinions and, therefore, admissible here pursuant to Fed. R. Evid 703.”).

IV. CONCLUSION

Petitioner respectfully requests the Board deny Maxeon's Motion.

Respectfully submitted,

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

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that, on November 13, 2025, I caused a true and correct copy
of the following materials:

- Petitioner's Opposition to Patent Owner's Motion to Exclude
- Petitioner's Table of Exhibits
- Exhibit 1089

to be served on Patent Owner via electronic mail to:

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Petitioner's Table of Exhibits

No.	Description
1001	U.S. Patent No. 8,878,053 B2 ("USP053")
1002	File History for U.S. Patent No. 8,878,053 B2 (App. No. 13/495,577) ("FH053")
1003	Declaration of Dr. Zachary Holman Regarding U.S. Patent No. 8,878,053 B2
1004	EP1732142A1 to Froitzheim ("Froitzheim")
1005	Gan and Swanson, <i>Polysilicon Emitters for Silicon Concentrator Solar Cells</i> , <i>IEEE Conference on Photovoltaic Specialists</i> , Vol. 1, Pages 245-240 (1990) ("Gan")
1006	WO 2009/094575 A2 ("Borden-575")
1007	U.S. Patent No. 6,998,288 to Smith ("Smith")
1008	CN 1949545A to Li (Translation) ("Li")
1009	Translation Declaration for Li
1010	Zachary C. Holman, <i>Electron Transport in Amorphous Silicon</i> (May 2005) (Thesis Presented to The Division of Mathematics and Natural Sciences, Reed College) ("Holman-Thesis")
1011	Reserved
1012	Reserved
1013	Declaration of June Munford
1014	Complaint for Patent Infringement, <i>Maxeon Solar Pte. Ltd. v. Hanwha Solutions Corp., et al.</i> , Civil Action No. 2:24-cv-262 (E.D. Tex. Apr. 19, 2024), ECF No. 1 ("Complaint")
1015	U.S. Patent No. 7,468,485 to Swanson ("Swanson")
1016	R. J. Komp, <i>Practical Photovoltaics Electricity From Solar Cells</i> , 3rd Ed. (2002) ("Komp")
1017	BP Solar Global Marketing, BP-MSX-120, 120-Watt Multicrystalline Photovoltaic Module ("BP-MSX-120")
1018	J. Nelson, <i>The Physics of Solar Cells</i> , Imperial College Press (2003) ("Nelson")
1019	T. Krygowski, A. Rohatgi, D. Ruby, <i>Simultaneous P and B Diffusion, In-Situ Surface Passivation, Impurity Filtering and Gettering for High-Frequency Silicon Solar Cells</i> , SAND-97-2620C; CONF-970953- ("Krygowski")

No.	Description
1020	A. Luque, S. Hegedus, <i>Handbook of Photovoltaic Science and Engineering</i> , Wiley (2003) ("Luque")
1021	J. Gordon, <i>Solar Energy the State of the Art</i> , ISES (2001) ("Gordon")
1022	U.S. Patent No. 6,262,359 to Meier ("Meier")
1023	U.S. Patent No. 4,525,593 to Yablonovitch ("Yablonovitch")
1024	WO 2009/094578 A2 ("Borden-578")
1025	U.S. Patent No. 4,665,277 to Sah ("Sah")
1026	D. Chapin et al., <i>A New Silicon P-N Junction Photocell for Converting Solar Radiation into Electrical Power</i> , J. Appl. Phys. 25, 676 (1954) ("Chapin")
1027	W. Shockley, H. J. Queisser, <i>Detailed Balance Limit of Efficiency of pn Junction Solar Cells</i> , J. Appl. Phys. 32, 510 (1961) ("Shockley")
1028	A. Metz, R. Meyer, B. Kuhlmann, M. Grauvogl, R. Hezel, <i>18.5% Efficient First-Generation MIS Inversion-Layer Silicon Solar Cells</i> , 26th PVSC (1997) ("Metz")
1029	D. De Ceuster, P. Cousins, D. Rose, D. Vicente, P. Tipones, W. Mulligan, <i>Low Cost, High Volume Production of >22% efficiency silicon solar cells</i> , 22nd European Photovoltaic Solar Energy Conference, 3-7 September 2007, Milan, Italy, pp. 816-819 ("De-Ceuster")
1030	J. Benick, J. Rentsch, Ch. Schetter, C. Voyer, D. Biro, R. Preu, <i>PECVD PSG as a Dopant Source for Industrial Solar Cells</i> , Presented at the 21st European Photovoltaic Solar Energy Conference, September 4-8, 2006, Dresden (2CV.4.26) ("Benick")
1031	JP07-106611 to Okayasu (Translation) ("Okayasu")
1032	Translation Declaration for Okayasu
1033	Robert F. Pierret, <i>Semiconductor Device Fundamentals</i> , Addison Wesley Longman (Part I) (1996) ("Pierret")
1034	A. I. A. Rahim, C. D. Marsh, P. Ashburn, G. R. Booker, <i>Impact of Ex-Situ and In-Situ Cleans on the Performance of Bipolar Transistors With Low Thermal Budget In-Situ Phosphorus-Doped Polysilicon Emitter Contacts</i> , IEEE

No.	Description
	TRANSACTIONS ON ELECTRON DEVICES, VOL. 48, NO. 11 (November 2001) ("Rahim")
1035	N. S. Parekh, R. V. Taylor, D. O. Massetti, <i>A Simple Method to Control Bipolar Polysilicon Emitter Interfacial Oxide</i> , J. Electrochem. Soc., Vol. 141, No. 11, pp. 3167-3172 (1994) ("Parekh")
1036	E. Yablonovitch, T. Gmitter, R. M. Swanson, Y. H. Kwark, <i>A 720 mV open circuit voltage SiO_x:c-Si:SiO_x double heterostructure solar cell</i> , Appl. Phys. Lett. 47, 1211–1213 (1985) ("Yablonovitch-1985")
1037	Reserved
1038	Reserved
1039	File History of U.S. Patent App. No. 14/504,771 ("771FH")
1040	U.S. Patent No. 8,222,516 B2 ("USP516")
1041	Reserved
1042	U.S. Patent Appl. Pub. No. 2002/0142500 A1 ("Foglietti")
1043	Mark John Kerr, <i>Surface, Emitter and Bulk Recombination in Silicon and Development of Silicon Nitride Passivated Solar Cells</i> (2002) (Ph.D. Thesis, The Australian National University) ("Kerr")
1044	Reserved
1045	M. Green, <i>Silicon Solar Cells Advanced Principles & Practice</i> , Centre for Photovoltaic Devices and Systems (1995) ("Green-1995")
1046	Y. H. Kwark, R. M. Swanson, <i>N-Type Sipos and Poly-Silicon Emitters</i> , Solid-State Electronics Vol. 30, No. 11, pp. 1121-1125 (1987) ("Kwark")
1047	G. R. Wolstenholme, N. Jorgensen, P. Ashburn, G. R. Booker, <i>An investigation of the thermal stability of the interfacial oxide in polycrystalline silicon emitter bipolar transistors by comparing device results with high-resolution electron microscopy observations</i> , J. Appl. Phys. 61, 225–233 (1987) ("Wolstenholme")
1048	Reserved
1049	M. Green, <i>Solar Cells Operating Principles Technology and System Applications</i> (1986) ("Green-1986")

No.	Description
1050	N. G. Tarr, <i>A polysilicon emitter solar cell</i> , IEEE Electron Device Letters, vol. 6, no. 12, pp. 655-658, Dec. 1985 ("Tarr")
1051	R. M. Swanson, <i>Point Contact Solar Cells: Modeling and Experiment</i> , Solar Cells, 17, pp. 85-118 (1986) ("Swanson-1986")
1052	U.S. Patent No. 4,158,591 to Avery ("Avery")
1053	U.S. Patent No. 5,899,804 to Schlosser ("Schlosser")
1054	U.S. Patent No. 7,144,751 to Gee ("Gee")
1055	Reserved
1056	WO 2006/097303 A1 ("Agostinelli")
1057	P.V. Meyers, R. Kee, C. Wolden, L. Raja, V. Kaydanov, T. Ohno, R. Collins, M. Aire, J. Kestner, A. Fahrenbruch, <i>Atmospheric Pressure Chemical Vapor Deposition of CdTe for High Efficiency Thin Film PV Devices</i> , NREL Annual Report 26 January 1998 – 25 January 1999 (Sept. 1999) ("NREL-1999")
1058	R. M. Swanson, R. A. Sinton, <i>High-Efficiency Silicon Solar Cells, Advances in Solar Energy: An Annual Review of Research and Development</i> , vol. 6. Chapter 4 (1990) ("Swanson-1990")
1059	G. Lubberts, B. C. Burkey, F. Moser, E. A. Trabka, <i>Optical properties of phosphorus-doped polycrystalline silicon layers</i> , J. Appl. Phys. 52(11), (Nov. 1981) ("Lubberts")
1060	U.S. Patent No. 6,352,876 to Bordogna ("Bordogna")
1061	E. Centurioni, D. Iencinella, R. Rizzoli, F. Zignani, <i>Silicon Heterojunction Solar Cell: A New Buffer Layer Concept With Low-Temperature Epitaxial Silicon</i> , IEEE Transactions on Electron Devices, Vol. 51, No. 11 (November 2004) ("Centurioni")
1062	M. Farrokh-Baroughi, H. El-Gohary, S. Sivoththaman, <i>Optical, Electrical, and Structural Properties of PECVD Quasi Epitaxial Phosphorous Doped Silicon Films on Crystalline Silicon Substrate</i> , Canadian Solar Buildings Conference (August 20-24, 2004) ("Farrokh-Baroughi")
1063	Email chain between Counsel and Trial Board, dated December 11-12, 2024

No.	Description
1064	Plaintiff Maxeon Solar Pte. Ltd.'s Disclosure of Asserted Claims and Infringement Contentions, <i>Maxeon Solar Pte. Ltd. v. Hanwha Solutions Corp., et al.</i> , Civil Action No. 2:24-cv- 262 (E.D. Tex. Nov. 21, 2024)
1065	Docket Control Order, <i>Maxeon Solar Pte. Ltd. v. Hanwha Solutions Corp., et al.</i> , Civil Action No. 2:24-cv- 262 (E.D. Tex. Nov. 25, 2024), ECF No. 33
1066	Reserved
1067	Reserved
1068	Reserved
1069	Reserved
1070	Declaration of Mark D. Selwyn in Support of Petitioner's Notice of Intent to Designate Mark D. Selwyn, a Provisionally Recognized PTAB Attorney, as Back-Up Counsel Pursuant to 37 C.F.R. § 42.10(c)
1071	Deposition Transcript of Douglas S. Ruby, Ph.D., June 24, 2025, in <i>Canadian Solar, Inc. v. Maxeon Solar Pte, Ltd.</i> , IPR2024-01039, IPR20024-01040 ("Ruby-CSI-Dep.")
1072	Sandia Report, Fundamental Understanding and Development of Lost-Cost, High-Efficiency Silicon Solar Cells, Annual Progress Report: Sept. 1998-Aug. 1999 (May 2000) ("Sandia-2000")
1073	U.S. Patent Number 5,792,280 to Ruby ("Ruby-280")
1074	D.S. Ruby, et al., Simplified processing for 23%-efficient silicon concentrator solar cells, Conference Record of the Twenty Third IEEE Photovoltaic Specialists Conference pp. 172-177 (1993) ("Ruby-1993")
1075	Deposition Transcript of Douglas S. Ruby, Ph.D., July 31, 2025, in <i>Hanwha Solutions Corp. v. Maxeon Solar Pte, Ltd.</i> , IPR2024-01199, IPR20024-01203 ("Ruby-Tr.")
1076	Reserved
1077	Reply Declaration of Dr. Zachary Holman Regarding U.S. Patent No. 8,222,516 B2 ("Reply-Decl.")
1078	David L. Pulfrey, MIS Solar Cells: A Review, IEEE Transactions on Electronic Devices, Vol ED-25, No. 11, Nov. 1978 ("Pulfrey")

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No.	Description
1079	M. Lemiti et al, Physical Properties of RT-LPCVD and LPCVD Polysilicon Thin Films: Application to Emitter Solar Cell (1994) (“Lemiti”)
1080	A. Metz et al., Record Efficiencies Above 21% for Mis-contacted Diffused Junction Silicon Solar Cells, 26th PVSC (Sept. 30 – Oct. 3, 1997) (“Metz-1997”)
1081	Reserved
1082	Reserved
1083	Reserved
1084	Reserved
1085	SAND Report, SAND 2001-0833, History of the Crystalline Silicon Photovoltaic Cell Research Program at Sandia National Laboratories (April 2001) (“Ruby-2001”)
1086	D. S. Ruby & J. D. McBrayer, The Effects Of Different Diffusion Sources On Silicon Solar Cell Recombination Properties, Sandia Nat’l. Labs. (1990) (“Ruby-1990”)
1087	Plaintiff Maxeon Solar Pte. Ltd.’s Disclosure of Asserted Claims and Infringement Contentions, <i>Maxeon Solar Pte. Ltd. v. Hanwha Solutions Corp., et al.</i> , Civil Action No. 2:24-cv- 262 (E.D. Tex. Nov. 21, 2024) (“Maxeon-IC”)
1088	Errata from the May 8, 2025 Deposition of Dr. Zachary Holman
1089	Declaration of Gilbert T. Smolenski dated September 5, 2025