

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 IPR2024-01203
U.S. Patent No. 8,222,516

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. 37) on August 14, 2025, concerning U.S. Patent No. 8,222,516 (“the ‘516 patent”).

Exhibit	Objection(s)
Ex. 1071	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 ‘516 patent or otherwise relevant to this proceeding and this exhibit does not appear in the reply or expert declaration. 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.
Ex. 1072	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 ‘516 patent or otherwise relevant to this proceeding and this exhibit does not appear in the reply or expert declaration. 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. 1074	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 ‘516 patent or otherwise relevant to this proceeding and this exhibit does not appear in the reply or expert declaration.

Exhibit	Objection(s)
	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. 1078	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 '516 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. 1079	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 '516 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. 1080	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 '516 patent or otherwise relevant to this proceeding.

Exhibit	Objection(s)
	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. 1081	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 '516 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. 1082	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 '516 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. 1083	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 '516 patent or otherwise relevant to this proceeding.

Exhibit	Objection(s)
	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. 1084	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 '516 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. 1085	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 '516 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. 1086	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 '516 patent or otherwise relevant to this proceeding.

Exhibit	Objection(s)
	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.
1077 ¶¶ 32, 34, 55, 57, and 60	Paragraphs 32, 34, 55, 57, and 60 of Exhibit 1077 cite Exhibit 1078, and therefore violate the same rules of evidence as Exhibit 1078 (stated above).
1077 ¶¶ 32, 34, 55, 57, and 60	Paragraphs 32, 34, 55, 57, and 60 of Exhibit 1077 cite Exhibit 1079, and therefore violate the same rules of evidence as Exhibit 1079 (stated above).
1077 ¶¶ 32, 34, 55, 57, and 60	Paragraphs 32, 34, 55, 57, and 60 of Exhibit 1077 cite Exhibit 1080, and therefore violate the same rules of evidence as Exhibit 1080 (stated above).
1077 ¶ 43	Paragraph 43 (and accompanying figure) of Exhibit 1077 cites Exhibit 1081, and therefore violates the same rules of evidence as Exhibit 1081 (stated above).
1077 ¶ 43	Paragraph 43, fn 5 of Exhibit 1077 cites Exhibit 1082, and therefore violates the same rules of evidence as Exhibit 1082 (stated above).
1077 ¶ 44	Paragraph 44 of Exhibit 1077 cites Exhibit 1083, and therefore violates the same rules of evidence as Exhibit 1083 (stated above).
1077 ¶ 44	Paragraph 44 of Exhibit 1077 cites Exhibit 1084, and therefore violates the same rules of evidence as Exhibit 1084 (stated above).
1077 ¶ 28	Paragraph 27 of Exhibit 1077 cites Exhibit 1085, and therefore violate the same rules of evidence as Exhibit 1085 (stated above).
1077 ¶¶ 34 and 66	Paragraphs 34 and 66 of Exhibit 1077 cite Exhibit 1086, and therefore violate the same rules of evidence as Exhibit 1086 (stated above).

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

/Jeremy D. Peterson/

Jeremy D. Peterson (Reg. No. 52,115)

*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:

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Date: August 21, 2025

/Jeremy D. Peterson/

Jeremy D. Peterson (Reg. No. 52,115)

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Solar Pte. Ltd.*