UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RUNERGY USA INC. AND RUNERGY ALABAMA INC. ET AL,

Petitioner,

v.

TRINA SOLAR CO., LTD.,

Patent Owner.

Case No. IPR2025-00006
U.S. Patent No. 10,230,009

PATENT OWNER'S OBJECTIONS TO PETITIONER'S REPLY EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Patent Owner hereby objects to the exhibits cited and relied upon in Petitioner's October 20, 2025 reply on the following grounds. For each objected to exhibit, the pertinent Federal Rule of Evidence ("FRE") or other rule that gives rise to the objection is provided, along with a brief summary of the basis of the objection.

1. **Ex. 1045 – Deposition Transcript of Martin Peckerar, Ph.D (Aug. 1, 2025): FRE 802.** The exhibit includes out of court, hearsay statements that are being improperly cited to establish the truth of the matter asserted (including the features possessed by and operation of the depicted product). Petitioner has not established that any hearsay exception applies. **FRE 901.** Petitioner failed to properly authenticate the information in this exhibit when it elected not to take Dr. Peckerar's deposition in this proceeding. **FRE 402.** The exhibit is irrelevant because, among other reasons, Petitioner failed to proffer the exhibits, declarations, and other documents to which the testimony set forth in the exhibit relates.

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: October 27, 2025

/K. Patrick Herman/

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CERTIFICATE OF SERVICE

The undersigned hereby confirms that the foregoing paper and associated exhibits were caused to be served via email on the following counsel of record for Petitioner on October 27, 2025:

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