

UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE PATENT TRIAL AND APPEAL BOARD

RUNERGY USA INC., RUNERGY ALABAMA INC., MUNDRA SOLAR PV
LTD., ADANI SOLAR USA INC., and CANADIAN SOLAR (USA) INC.¹

Petitioners,

v.

TRINA SOLAR CO., LTD.,

Patent Owner.

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

**PATENT OWNER'S UPDATED EXHIBIT LIST AND
HEARING DEMONSTRATIVES**

¹ Mundra Solar PV Ltd. and Adani Solar USA Inc. were joined as petitioners in this proceeding based on a petition and motion for joinder filed in IPR2025-00187, which was granted. Canadian Solar (USA) Inc. was joined as a petitioner in this proceeding based on a petition and motion for joinder filed in IPR2025-00917, which was granted.

Pursuant to the Board’s Order Setting Oral Argument (Paper 28), Patent Owner submits the following updated exhibit list and associated set of Demonstrative Exhibits.

Exhibit	Description
2001	Expert Declaration of Dr. Martin Peckerar
2002	Transcript from the June 20, 2025 Deposition of Dr. Sanjay Banerjee
2003	U.S. Patent No. 5,989,718 to Smith et al.
2004	Yousuf et al., “A Review on TOPCon Solar Cell Technology,” Current Photovoltaic Research 9(3) 75-83 (2021)
2005	Yousuf et al., “Tunnel Oxide Deposition Techniques and Their Parametric Influence on Nano-Scaled SiO _x Layer of TOPCon Solar Cell: A Review,” Energies 2022
2006	Glunz et al., “Silicon-based passivating contacts: The TOPCon route,” Prog Photovolt Res Appl. 2021: 1-19 (2021)
2007	Kreig et al., “Wet Chemical Poly-Si(n) Wrap-Around Removal for TOPCon Solar Cells,” EPJ Photovoltaics 15, 9 (2024).
2008	Yamaguchi et al., “Characterization of Tunnel Oxide Passivated Contact Fabricated by Sputtering and Ion Implantation Technique,” Japanese Journal of Applied Physics 62 SK1024 (2023)
2009	Christiansen, “Thermal Oxidation of structured Silicon Dioxide,” ECS Journal of Solid State Science and Technology, 3 (5) N63-N68 (2014)
2010	Transcript from the November 20, 2025 Deposition of Dr. Sanjay Banerjee
2011	Patent Owner’s Hearing Demonstratives

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

Dated: January 22, 2026

/K. Patrick Herman/

K. Patrick Herman, Reg. No. 75,018
Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019
Telephone: (212) 506-3596
Email: P52PTABDocket@orrick.com

Attorneys for Patent Owner

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 January 22, 2026:

Samuel Tiu
Brooke Boll
Tung Nguyen
Michael Roberts
SIDLEY AUSTIN LLP
stiu@sidley.com
brooke.boll@sidley.com
tnguyen@sidley.com
mlroberts@sidley.com

David Tennant
Naveen Modi
Shamita Etienne-Cummings
Jeremy Rashid
PAUL HASTINGS LLP
davidtennant@paulhastings.com
naveenmodi@paulhastings.com
shamitaetienne@paulhastings.com
jeremyrashid@paulhastings.com

/K. Patrick Herman/

K. Patrick Herman (Reg. No. 75,018)
Orrick, Herrington & Sutcliffe LLP
51 West 52nd Street
New York, NY 10019-6142
Telephone: (212) 506-3702
Email: P52PTABDocket@orrick.com