

**UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.**

**Before the Honorable Monica Bhattacharyya
Administrative Law Judge**

**In the Matter of
CERTAIN TOPCON SOLAR CELLS,
MODULES, PANELS, COMPONENTS
THEREOF, AND PRODUCTS
CONTAINING SAME**

**Investigation Nos.
337-TA-1422/1425 (Consolidated)**

**THE PRIVATE PARTIES' RENEWED JOINT MOTION TO TERMINATE
THE INVESTIGATION ON THE BASIS OF WITHDRAWAL OF COMPLAINT**

Complainants Trina Solar (U.S.), Inc., T1 G1 Dallas Solar Module (Trina) LLC and Trina Solar Co., Ltd. (“Trina” or “Complainants”) and Respondents Adani Solar USA Inc. (“ASUSA”) and Mundra Solar PV Ltd. (“MSPVL”) (collectively, the “Respondents”) (all together, “the Private Parties”) respectfully renew their motion to terminate the above-captioned investigation in its entirety pursuant to 19 U.S.C. § 1337(c) and 19 C.F.R. §§ 210.21(a) on the basis of withdrawal of the complaint.¹ Attached as Exhibit A is December 2025 purchase order documentation as to commercial supply by Trina to MPSVL in Asian markets. Attached as Exhibit B is a December 29, 2025 Letter of Intent on Strategic Cooperation, including provisions as to resolving all disputes, legal actions, and proceedings presently pending between the Private Parties in the United States. Attached as Exhibit C is T1 Energy Inc.’s December 30, 2025 8K submission to the Securities and Exchange Commission showing that Trina Solar Co. Ltd. sold and assigned all of its right, title

¹ The Private Parties filed an initial motion to stay and terminate the investigation (Mot. Dkt. No. 1422-030) on December 29, 2025. On January 6, 2026, the Private Parties filed a response regarding the ALJ’s Order No. 38 dated on January 5, 2026, EDIS Doc. ID 867874. On January 6, 2026, the ALJ issued an order granting as to stay but denying as to termination without prejudice and ordering the present renewed motion. *See* Order No. 39, EDIS Doc. ID 868125, at 2.

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and interest in the Asserted Patents to Evervolt Green Energy Holding Pte Ltd. There are no other agreements, written or oral, express or implied, between the Complainants and Respondents regarding the subject matter of this investigation.

Commission Rule 210.21(a)(1) states that “[a]ny party may move at any time prior to the issuance of an initial determination on violation of section 337 of the Tariff Act of 1930 to terminate an investigation in whole or in part as to any or all respondents, on the basis of withdrawal of the complaint.” 19 C.F.R. § 210.21(a)(1). Commission Rule 210.21(a)(1) further requires that:

A motion for termination of an investigation based on withdrawal of the complaint....shall...if there are any agreements concerning the subject matter of the investigation, all such agreements shall be identified, and if written, a copy shall be filed with the Commission along with the motion. If the agreement contains confidential business information within the meaning of § 201.6(a) of this chapter, at least one copy of the agreement with such information deleted shall accompany the motion, in addition to a copy of the confidential version....The presiding administrative law judge may grant the motion in an initial determination upon such terms and conditions as he deems proper.

Exhibits A and B contain the Private Parties’ Confidential Business Information within the meaning of 19 C.F.R. § 201.6. Accordingly, the Private Parties request that they be treated as containing as such under the Protective Order, with redacted versions further provided as Exhibits A [Public] and B [Public] in accordance with Rule 210.21(a)(1). *See, e.g., Certain Semiconductor Devices Having Layered Dummy Fill, Electronic Devices, and Components Thereof*, Inv. No. 337-TA-1342, Order No. 20 (Initial Determination), at 5 (March 14, 2023) (finding that certain terms in underlying agreements constitute confidential business information of the parties within the meaning of Rule 201.6(a)).

The Commission has held “in the absence of extraordinary circumstances, termination of an investigation will be readily granted to a complainant during the prehearing stage of an investigation.” *See Certain Silicon-on-Insulator Wafers*, Inv. No. 337-TA-966, Order No. 14 at 2

(May 5, 2016) (citing *Certain Ultrafiltration Membrane Systems & Components Thereof Including Ultrafiltration Membranes*, Inv. No. 337-TA-107, Comm’n Action and Order at 2 (March 11, 1982)); *Certain Passenger Vehicle Auto. Wheels*, Inv. No. 337-TA-1006, Order No. 19 (Dec. 2, 2016) (granting motion to terminate the investigation as to one respondent based on partial withdrawal of the Complaint); *Certain Composite Intermediate Bulk Containers* (“Bulk Containers”), Inv. No. 337-TA-1014, Order No. 13 at 3 (Feb. 22, 2017) (granting motion for termination of investigation based on withdrawal of complaint).

There are no extraordinary circumstances that would preclude termination of this Investigation, as evidenced by Exhibits A-C. The requested termination is timely and serves the public interest because it will conserve Commission and party resources. *See Certain Flocked Swabs, Products Containing Flocked Swabs, And Methods of Using Same*, Inv. No. 337-TA-1279, Order No. 25 at 2 (November 15, 2021); *See., e.g., Certain Nitrile Gloves*, Inv. No. 337-TA-608, Order No. 7 at 2 (August 2, 2007) (“[W]hen a complainant seeks to terminate based on withdrawal of the complaint, public policy supports termination in order to conserve public and private resources.”); *Certain Table Saws Incorporating Active Injury Mitigation Technology*, Inv. No. 337-TA-965, Order No. 13 at 2 (May 3, 2016) (citing *Certain Power Supplies*, Inv. No. 337-TA-646, Order No. 18 at 2 (January 5, 2009)).

Termination of this investigation will not adversely affect the public health and welfare, competitive conditions of the U.S. economy, the production of like or directly competitive articles in the United States, or U.S. consumers. The public interest and administrative economy will be served by granting this motion and preserving resources for both the Commission and the Private Parties. *See* Ex. A-C. Motion to terminate an investigation based on withdrawal of the complaint are routinely granted and not reviewed by the Commission. *See, e.g., Certain LED Landscape*

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Lighting Devices and Components Thereof, Inv. No. 337-TA-1261, Order No. 22 at 2-3 (September 24, 2021) (“termination of this Investigation does not impose any undue burdens on the public health and welfare, competitive conditions in the United States economy, production of like or directly competitive articles in the United States, or United States consumers.”); *Certain Digital Cameras, Software, and Components Thereof*, Inv. No. 337-TA-1059, Comm’n Notice, at 3 (March 8, 2019) (“Moreover, the public interest favors [termination] to avoid needless litigation and to conserve public and private resources.”).

For the forgoing reasons, Trina and Respondents respectfully request that the Commission terminate this investigation in its entirety pursuant to 19 U.S.C. § 1337(c) and 19 C.F.R. §§ 210.21(a)

Ground Rule 3.2 Certification

Pursuant to Ground Rule 3.2, counsel for Complainants and Respondents contacted the Commission Investigative Staff, which will take a position after reviewing the moving papers.

Date: January 9, 2026

Respectfully submitted,

/s/ Joshua Pond

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on January 9, 2026 upon the following parties as indicated:

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/s/ Cheryl Watson

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