

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

RUNERGY USA INC. AND RUNERGY ALABAMA INC.

Petitioners,

v.

TRINA SOLAR CO., LTD.,

Patent Owner

IPR2025-00007

Patent No. 9,722,104

PETITIONER'S NOTICE OF OBJECTIONS TO EVIDENCE

Pursuant to 37 C.F.R. § 42.64(b)(1), Petitioners Runergy USA Inc. and Runergy Alabama Inc. hereby submit their notice of objections to certain evidence that Patent Owner Trina Solar Co., Ltd. submitted with its Patent Owner Response (Paper No. 16) on July 28, 2025 in connection with IPR2025-00007.

Exhibit Number	Objection(s)
Exs. 2004-2009	FRE 802: These exhibits are hearsay because the information within these documents is used for the truth of the matter asserted. FRE 401, 402, 403: Patent Owner has not proven that these documents were prior art that was publicly available or otherwise relevant to this proceeding as of the priority date. To the extent they are relevant, their probative value is outweighed by the danger of causing unfair prejudice, confusing the issues, causing undue delay, wasting time or needlessly presenting cumulative evidence, and therefore the exhibits and any related testimony are inadmissible under Rule 403.
“Electronic Materials: Science and Technology” (Cited in the Declaration of Dr. Martin Peckerar (Ex. 2002))	Petitioners object that this document was cited in the Declaration of Dr. Martin Peckerar (Ex. 2002) but not timely provided as an exhibit. Petitioners reserve the right to present additional objections if and when a complete copy of this document is provided by Patent Owner.

These objections are timely presented, as they are submitted and served within five business days of the filing of Patent Owner’s Response. 37 C.F.R. § 42.64. Petitioners reserve the right to file a motion to exclude the evidence objected to herein.

Dated: August 4, 2025

Respectfully submitted,

/Samuel N. Tiu/

Samuel N. Tiu

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Lead Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, 2025, a copy of the following was served in its entirety via electronic mail on the following counsel of record for the Patent Owner:

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Dated: August 4, 2025

Respectfully submitted,

/Nancy Gregg/