

UNITED STATES INTERNATIONAL TRADE COMMISSION
Washington, D.C.

Before the Honorable Doris Johnson Hines
Administrative Law Judge

In the Matter of

CERTAIN PHOTOVOLTAIC TRUNK BUS
CABLE ASSEMBLIES AND
COMPONENTS THEREOF

Investigation No. 337-TA-1438

**COMPLAINANT SHOALS TECHNOLOGIES GROUP, LLC’S UNOPPOSED MOTION
TO TERMINATE IN PART AS TO CERTAIN CLAIMS OF THE ASSERTED PATENTS**

Ground Rule 5.1 Certification: Pursuant to Ground Rule 5.1, counsel for Complainant and Respondents conferred regarding the present motion, and counsel for Respondents indicated that they do not oppose.

* * *

Complainant Shoals Technologies Group, LLC (“Shoals”), pursuant to Commission Rule 210.21(a), hereby respectfully moves to terminate this Investigation in part as to claims 2, 3, 4, 6, 7, 9, 11, 15, 16, 17, 18, 19, 21, 22, 23, 24 of U.S. Patent No. 12,015,375 (the “375 Patent”); and claims 2, 3, 4, 5, 6, 9, 13, 14, 15, 16, 18, 19, 20 of U.S. Patent No. 12,015,376 (the “376 Patent”).

On January 9, 2025, Shoals filed a Complaint in the United States International Trade Commission, alleging that Respondents Voltage LLC and Ningbo-Voltage Smart Production (collectively, “Respondents” or “Voltage”) violated and continue to violate 19 U.S.C. § 1337 through the unlawful importation, sale of importation, and/or sale within the United States after importation of certain sensors with pixels and products containing the same that directly infringe claims 1, 2-12, 15, 16-19, 20, 21-24 of the 375 Patent; and claims 1, 2-6, 8-10, 12-13, 14, 15-16,

19-20 of the 376 Patent, either literally or under the doctrine of equivalents. Shoals further alleged that its domestic industry products practice one or more of claims 1, 2-14, 15, 16-19, 20, 21-24 of the 375 Patent; and claims 1, 2-6, 8-13, 14, 15-16, 18-20 of the 376 Patent. Shoals filed a supplement to the complaint on January 24, 2025, asserting the same claims, respectively, for infringement and domestic industry.

The below chart identifies the remaining asserted infringement and domestic industry claims:

U.S. Patent	Infringed Claims	Domestic Industry Claims
12,015,375	1, 5, 8, 10, 12, 20	1, 5, 8, 10, 12, 13, 14, 20
12,015,376	1, 8, 10, 12	1, 8, 10, 11, 12

Pursuant to Commission Rule 210.21(a), Shoals respectfully moves to terminate this Investigation in part to withdraw the allegations in its Complaint of infringement of claims 2, 3, 4, 6, 7, 9, 11, 15, 16, 17, 18, 19, 21, 22, 23, 24 of the 375 Patent; and claims 2, 3, 4, 5, 6, 9, 13, 14, 15, 16, 19, 20 of the 376 Patent. The claims that remain in this Investigation are identified in the above chart.

Commission Rule 210.21(a)(1) provides in part 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 or certain allegations contained therein[.]” Pursuant to Commission Rule 210.21(a)(1), Shoals hereby represents that there are no agreements, written or oral, express or implied between the parties concerning the subject matter of this Investigation. Accordingly, Shoals respectfully requests that this motion be granted.

Dated: August 19, 2025

Respectfully submitted,

/s/ Kimberly E. Coghill

Kimberly E. Coghill
Puja Patel Lea
Troutman Pepper Locke LLP
401 9th Street, N. W.
Suite 1000
Washington, D.C. 20004
Tel: 202.220.1200
Fax: 202.220.1465

William Belanger
Frank Liu
Dustin Ferzacca
Brittany Reeves
Gillian Schutt
Troutman Pepper Locke LLP
111 Huntington Avenue, 9th Floor
Boston, MA 02199-7613
Tel: 617.239.0100
Fax: 617.227.4420

Ryan C. Deck
Troutman Pepper Locke LLP
104 Carnegie Center Drive, Suite 203
Princeton, NJ 08540
Tel: 609.452.0808
Fax: 609.452.1147

Mikaella M. Evaristo
Troutman Pepper Locke LLP
875 Third Avenue
New York, NY 10022
Tel: 212.912.2791
Fax: 212.704.6288

Email: Shoals1438@troutman.com

***Counsel for Complainant
Shoals Technologies Group, LLC***

CERTIFICATE OF SERVICE

I, Madeleine R. Anthony, hereby certify that on August 19, 2025 a true and correct copy of the foregoing document was served upon the following parties as indicated below:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street, S.W. Washington, D.C. 20436	☒ Via Electronic Filing
The Honorable Doris Johnson Hines U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, D.C. 20436	☒ Via Box ☒ Via Electronic Mail JohnsonHines1438@usitc.gov
Yar R. Chaikovsky Philip Ou Bruce Yen Michael Costello-Caulkins Sojung Yun Yolanda Xu Brady Schoenlein Mick Li Payton Fong WHITE & CASE LLP 3000 El Camino Real 2 Palo Alto Square, Suite 900 Palo Alto, CA 94306-2109 Jordan Coyle WHITE & CASE LLP 701 13th St NW # 600 Washington, DC 20005 Elizabeth Oh WHITE & CASE LLP 1221 Avenue of the Americas New York, New York 10020-1095 <i>Counsel for Respondents Voltage LLC and Ningbo Voltage Smart Production Co.</i>	☒ Via Electronic Mail yar.chaikovsky@whitecase.com WCVoltage337TA1438@whitecase.com

/s/ Madeleine R. Anthony
Madeleine R. Anthony
IP Litigation Paralegal
Troutman Pepper Locke LLP

875 Third Avenue
New York, NY 10022