

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

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

In the Matter of

**CERTAIN PHOTOVOLTAIC
CONNECTORS AND COMPONENTS
THEREOF**

Investigation No. 337-TA-1365

**STIPULATION BETWEEN COMPLAINANT AND VOLTAGE RESPONDENTS
REGARDING PROSECUTION BAR**

Complainant Shoals Technologies Group, LLC (“Shoals”) and Respondents Voltage, LLC, and Ningbo Voltage Smart Production Co. (collectively, “Voltage”) (Shoals and Voltage are referred herein collectively as “Private Parties”), hereby stipulate and agree as follows with respect to the protective order governing this Investigation.

1. Shoals asserts three patents against Voltage: U.S. Patent Nos. 10,553,739 (“’739 Patent”), U.S. Patent No. 10,992,254 (“’254 Patent”) and U.S. Patent No. 11,689,153 (“’153 Patent”). The ’739 Patent and ’254 Patent were asserted in the original complaint filed May 4, 2023.

2. The ’153 Patent, which is a continuation of the ’254 Patent, issued on June 27, 2023. On July 18, 2023, an initial determination issued granting Shoals’ motion to amend the complaint and notice of investigation to add the ’153 Patent. Order No. 5.

3. On June 26, 2023, another continuation application, 18/341,655, of the parent application for the ’254 Patent and ’153 Patent was filed before the U.S. Patent Office.

4. Counsel for Shoals, the law firm Maschoff Brennan, is identified as counsel of record for the continuation application that led to the '153 Patent and filed the continuation application, 18/341,655, after the institution of this Investigation.

5. Maschoff Brennan agrees to institute an ethical wall prohibiting the involvement of all attorneys who have access to Voltage's confidential information disclosed in this Investigation from the prosecution of the continuation application, 18/341,655, and any subsequent related applications.

6. Nothing herein is intended to alter the restrictions in the Protective Order, including the prohibition of any person who has reviewed confidential information under the Protective Order from using that information for any purpose other than this Investigation, including for patent prosecution.

7. The Private Parties discussed the foregoing stipulation with Commission Investigative Staff and the Private Parties understand that Commission Investigative Staff does not oppose and agrees with the terms of this Stipulation.

IT IS SO STIPULATED.

Dated: September 20, 2023

Respectfully Submitted,

/s/ Charles S. Barquist

Charles S. Barquist
MASCHOFF BRENNAN
1801 Century Park East, Suite 2400
Los Angeles, California 90067

Kirk R. Harris
Eric L. Maschoff
MASCHOFF BRENNAN
111 South Main Street, Suite 600
Salt Lake City, Utah 84111

Christina L. Trinh
Carol A. Hanna Girgis
Saloni Mathur
MASCHOFF BRENNAN
100 Spectrum Center Drive, Suite 1200
Irvine, California 92618

ShoalsMB-ITC@mabr.com

Daniel E. Yonan
Uma Everett
Josephine Kim
Davin Guinn
**STERNE, KESSLER, GOLDSTEIN
& FOX PLLC**
1101 K Street, NW, 10th Floor
Washington, D.C. 20005

Shoals-ITC@sternekessler.com

*Counsel for Complainant Shoals Technologies
Group, LLC*

/s/ Philip Ou

Yar R. Chaikovsky
Philip Ou
Jonathan Lamberson
Bruce Yen
Michael Costello-Caulkins
Zhaoqi Xu
WHITE & CASE LLP
3000 El Camino Real
2 Palo Alto Square, Suite 900
Palo Alto, CA 94306-2109

Colleen Tracy James
WHITE & CASE LLP
1221 Avenue of the Americas
New York, New York 10020-1095

Jordan Coyle
WHITE & CASE LLP
701 13th St NW # 600
Washington, DC 20005

James Hsiao
WHITE & CASE LLP
16th Floor, York House
The Landmark
15 Queen's Road Central
Hong Kong SAR

WCVoltage337TA1365@whitecase.com

*Counsel for Respondents Voltage LLC
and Ningbo Voltage Smart Production Co.*

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CERTIFICATE OF SERVICE

I, hereby certify that on this day, September 20, 2023, a true and correct copy of the foregoing has been served on the following as indicated:

The Honorable Lisa R. Barton Secretary to the Commission U.S. International Trade Commission 500 E Street SW, Room 112-A Washington, D.C. 20436	☒ Via Electronic Filing (EDIS) ☐ Via Electronic Filing (OUII Box) ☐ Via Hand Delivery ☐ Via First Class Mail ☐ Via Electronic Mail ☐ Via Overnight Courier
Monica Bhattacharyya Administrative Law Judge U.S. International Trade Commission 500 E Street, S.W., Room 317 Washington, D.C. 20436 Bhattacharyya337@usitc.gov	☐ Via Electronic Filing (EDIS) ☐ Via Electronic Filing (OUII Box) ☐ Via Hand Delivery ☐ Via First Class Mail ☒ Via Electronic Mail ☐ Via Overnight Courier
John Shin, Esq. OFFICE OF UNFAIR IMPORT INVESTIGATIONS U.S. INTERNATIONAL TRADE COMMISSION 500 E Street, S.W., Suite 401 Washington, D.C. 20436 John.shin@usitc.gov	☐ Via Electronic Filing (EDIS) ☐ Via Electronic Filing (OUII Box) ☐ Via Hand Delivery ☐ Via First Class Mail ☒ Via Electronic Mail ☐ Via Overnight Courier
Siddhesh V. Pandit Timothy J. Maier Michael R. Casey Daniel J. Ehrlich MAIER & MAIER 345 South Patrick Street Alexandria, VA 22314	☐ Via Electronic Filing (EDIS) ☐ Via Electronic Filing (OUII Box) ☐ Via Hand Delivery ☐ Via First Class Mail ☒ Via Electronic Mail ☐ Via Overnight Courier

hikamitc1365@maierandmaier.com

Counsel for Respondents Hikam America, Inc., Hikam Electrónica de México, S.A. de C.V., Hikam Tecnología de Sinaloa, Hewtech Philippines Corp., Hewtech Philippines Electronics Corp., and Hewtech (Shenzhen) Electronics Co., Ltd.

/s/ Nikole Faasisila

Nikole Faasisila
White & Case LLP