

UNITED STATES INTERNATIONAL TRADE COMMISSION
WASHINGTON, D.C.

Before the Honorable Johnson Hines
Administrative Law Judge

In the Matter of

CERTAIN PHOTOVOLTAIC
CONNECTORS AND COMPONENTS
THEREOF

Investigation No. 337-TA-1438

**RESPONDENTS' STATEMENT OF UNCONTESTED CLAIM ELEMENTS
WITH RESPECT TO INFRINGEMENT AND DOMESTIC INDUSTRY TECHNICAL
PRONG**

Pursuant to Ground Rule 14.3 and the procedural schedule, Order No. 2, Respondents Voltage, LLC, and Ningbo Voltage Smart Production Co. (collectively, “Voltage” or “Respondents”) (together, the “Parties”) submit their Statement of Uncontested Claim Elements “identify[ing] claim elements it does not dispute with respect to each of infringement and domestic industry technical prong.” G.R. 14.3.

Infringement:

In this Investigation and as of its opening post-hearing brief, Complainant Shoals Technologies Group LLC (“Shoals”) alleges infringement of claims 1, 8, 12, and 20 of the ’375 Patent¹ and claims 1, 10, and 12 of the ’376 Patent (emphasis added to identify independent claims) (“Asserted Claims”). Order No. 29; Complainant Shoals’ Opening Post-Hearing Brief, (September 5, 2025) (EDIS Doc. ID 861331). The accused products include: (1) Voltage’s LYNX (“LYNX”); (2) Voltage’s alternative design to LYNX adjudicated in

¹ Shoals’ initial post-hearing brief alleged infringement of claim 7, but claim 7 was terminated by Motion. Order No. 29.

337-TA-1365 (“1365 AD”) and (3) Voltage’s alternative designs to LYNX for which Voltage seeks adjudication in this investigation (“1438 ADs”²).

Voltage identifies the following claim elements as uncontested regarding alleged infringement by Respondents of the Asserted Claims.

’375 Patent:

Each claim limitation is uncontested, except for:

1. [1.h] “ at least a portion of the section of exposed wire of the drop line is parallel to at least a portion of the section of exposed wire of the feeder cable; wherein the one or more drop line pathways and the feeder pathway extend parallel to one another within the nexus”: LYNX, 1365 AD, 1438 ADs
2. [20.g] “wherein at least a portion of the drop line cable pathway is parallel to at least a portion of the feeder pathway; and wherein at least a portion of the first drop line pathway and at least a portion of the second drop line pathway extend in opposite directions along a longitudinal axis that is parallel to a longitudinal axis of the feeder pathway”: LYNX, 1365 AD, 1438 ADs
3. [1.b] “a monolithic mold that encapsulates the nexus”: 1365 AD

’376 Patent:

Each claim limitation is uncontested, except for:

1. [1.e] “wherein, in the region of electrical interconnection, the first drop line and the second drop line extend in opposite directions along a longitudinal axis that is parallel to a longitudinal axis of the feeder cable”: LYNX, 1365 AD, 1438 ADs

Voltage also contests that Shoals has met its burden with respect to “Representative Products.”

² Voltage seeks adjudication of six alternative designs: (1) P-Weld AD; (2) D-Weld AD; (3) Bolt AD; (4) Taper AD; (5) Taper-30 AD and (6) Spiral AD (“collectively, “1438 ADs”). The same uncontested claim elements apply for each.

Domestic Industry Technical Prong:

Shoals presently alleges, based on its opening post-hearing brief, that the technical prong for domestic industry is satisfied by its Big Lead Assembly (BLA) for claims 1, 12 and 14³, and 20 of the '375 Patent and claims 1 and 10-12 of the '376 Patent (emphasis added to identify independent claims) (“Asserted DI Claims”). Order No. 29; Complainant Shoals’ Opening Post-Hearing Brief, (September 5, 2025) (EDIS Doc. ID 861331).

Voltage does not contest that each claim limitation in the Asserted DI Claims is satisfied by at least one configuration of Shoals’ BLA, though Shoals still bears the burden to prove its technical domestic industry.

Dated: September 12, 2025

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³ Dependent claims 13-14 of the 375 Patent are not asserted against Voltage and only remain in this Investigation for Shoals’ technical prong of domestic industry.

CERTIFICATE OF SERVICE

I, Nikole Faasisila, hereby certify that the attached document has been served upon the following parties as indicated below on September 12, 2025.

RESPONDENTS' STATEMENT OF UNCONTESTED CLAIM ELEMENTS WITH RESPECT TO INFRINGEMENT AND DOMESTIC INDUSTRY TECHNICAL PRONG

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