

BIEN FAIT  
Translation and Patent Services  
Bruce D. Popp, PhD  
ATA Certified Translator, French into English  
USPTO Registered Patent Agent

**DECLARATION OF BRUCE D. POPP**

I, Bruce D. Popp, hereby declare as follows:

1. I possess advanced knowledge of the French and English languages. I have more than 15 years of experience translating patents and patent-related documentation from French into English. I have been an independent translator since 2002.
2. I am certified by the American Translators Association for French into English translations. In 2017, I was the recipient of the S. Edmund Berger Prize for Excellence in Scientific and Technical Translation.
3. I am a grader (for French into English) in the American Translators Association Certification Program.
4. I am a registered patent agent with the United States Patent and Trademark Office (registration number 66903).
5. I have in-depth knowledge of relevant sections of the European Patent Convention and French *Code de la propriété industrielle*.

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6. I have translated over 500 French and European patents to English.
7. I was awarded a PhD degree in Astronomy by Harvard University in 1985 and an AB in Physics, *magna cum laude*, by Cornell University in 1979.
8. I have received the *Diplôme approfondi de la langue française*, C2 level (mastery) certification in French-language abilities.
9. I have authored the following publications in the previous ten years:
  - I currently have a book project in the field history of physics under contract with Springer with a tentative publication date in 2023.
  - *Henri Poincaré: From Electrons to Special Relativity*, Springer, New York, 2020.
  - *Dealing with Terminology Drift*, The ATA Chronicle, vol. XLVIII, num. 1, Jan/Feb. 2019.
  - *The Three-Body Problem and the Equations of Dynamics: Poincaré's Foundational Work on Dynamical Systems Theory*, Springer, New York, 2017.
  - *Accuracy in Patent Translation*, Boston Patent Law Association Newsletter, vol. 40, issue 3, summer 2010.

- *Using Patents to Find the Terminology You Need*, The ATA Chronicle, vol. XXXVIII, num. 5, May 2009.

10. I have reviewed and been asked to comment on the translation of French Patent Application Pre-Grant Publication No. 2547252 to Rabbe, prepared by Mr. John Dawson and submitted by Petitioner Yita LLC as Exhibit 1005 in IPR2020-01139 and IPR2020-01142.

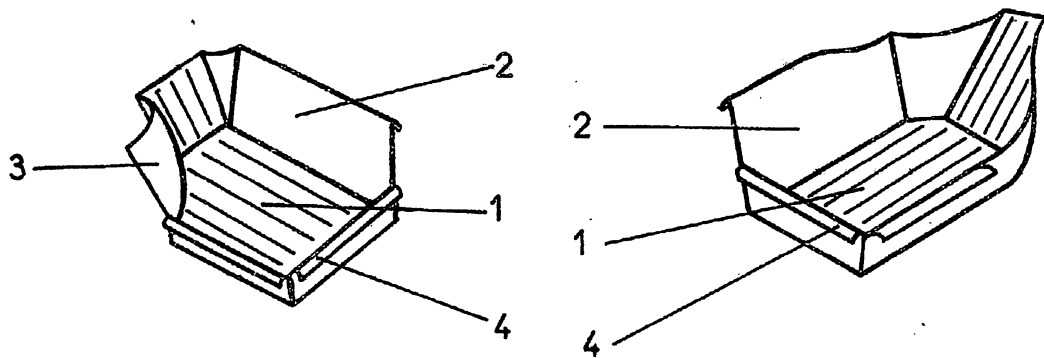
11. I prepared for that review by independently translating the Rabbe patent. In preparing that translation I used my preferred, standard reference works including:

- Le Petit Robert de la langue française © 2017 Dictionnaires Le Robert: a software application installed on my computer and sold by a leading French publisher of dictionaries. I have used this reference work for several years and consider it to be a reliable authority. It is a French dictionary, and does not provide translations to English.
- Collins Le Robert Comprehensive Dictionary: French-English, English-French © 2017 Dictionnaires Le Robert/HarperCollins Publishers: also a software application installed on my computer. I have used this reference work for several years and consider it to be a reliable

authority. It is a French-into-English and English-into-French dictionary.

12. This translation that I prepared is attached to my declaration as Attachment A. As indicated above, I am a professional translator fluent in French and English and I am American Translators Association Certified for translation from French into English. I state that to the best of my knowledge and belief I have accurately translated the Rabbe patent from French into English and that said accurate translation is attached.

13. The French word “rebord” is used in several places in the Rabbe reference. One place “rebord” is used is in Claim 4. Ex. 1005, p. 016. Claim 4 of Rabbe uses the term “rebord” and makes reference to numeral “(4)” of the drawings. Figures 3 and 4, for example, include reference numeral 4:



14. In Claim 4, Mr. Dawson has translated “rebord” as “flange.” Ex. 1005, p. 6.

I translated the same term as “rims.” While I prefer “rims” as a better

translation, the translation to “flange” is not indefensible. There is at least some dictionary support for that translation as noted below. However, the typical French words for “flange” would be “bride” or “collerette.” *See* Ex. 2029, Richard Ernst, *Dictionnaire des techniques et sciences appliquées* published in Paris in 2002 by Dunod, pages 138 and 233, and also Ex. 2025, Collins Le Robert Comprehensive Dictionary, referenced above. If one meant to use the term “flange” in French, one would typically choose “bride” or “collerette.” Thus, it would not be typical to translate “rebord” as “flange” unless the context in which the word was used clearly indicated more common translations of “rebord” did not make sense.

15. Ex. 2025 contains the entry for “rebord” from the 2017 Collins Le Robert Comprehensive Dictionary, referenced above. That dictionary includes “rim,” “edge” and “hem” as options for translating rebord. Ex. 2025 also contains the entry for “bride,” including “flange” or “strap” as options for translating bride, and the entry for “collerette,” including “flange” as an option for translating collerette.
16. Ex. 2026 is the entry for “rebord” from the Collins 1993 French to English dictionary. That dictionary includes “rim” “edge,” “window sill,” and “window ledge” as options for rebord.

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