UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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YITA LLC,
Petitioner,

v.

MACNEIL IP LLC,
Patent Owner.

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SUPPLEMENTAL DECLARATION OF BRUCE D. POPP, PhD

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.*

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.   Bilingual dictionaries (in the case of Exhibits 2025-29, 2032-35, and 2038, French-into-English dictionaries) provide suggested translations for headwords and frequently for sub-entries. They may, less often, provide usage examples and their suggested renderings in English. In the sub-entries and examples, conventionally the headword is not repeated and is replaced by a tilde (~).

Headword entries frequently include additional information to help users. This additional information may include a pronunciation in international phonetic alphabet (in the case of Exhibit 2025, for example, "bʀid", "kɔlʀɛt" and "ʀ(ə)bɔʀ"), grammatical or linguistic information, and other indications to distinguish between fields, context or connotations for which different renderings are suggested. Often this additional information is in the same language as the headword.

11.   Exhibit 2025 in IPR2020-01139 and IPR2020-01142 is a true and correct copy of the entries for "bride," "collerette," and "rebord" as found in the 2017 Collins Le Robert Comprehensive Dictionary: French-English, English-French © 2017 Dictionnaires Le Robert/HarperCollins Publishers. I obtained the contents of Exhibit 2025 from the Collins Le Robert Comprehensive Dictionary: French-English, English-French software application installed on my computer.

12.   I have been asked to prepare an English translation of the French abbreviations and words in the additional information in the entries for "bride," "collerette," and "rebord" in Exhibit 2025.

13.   In the entries for "bride," "collerette," and "rebord" in Exhibit 2025, the following French abbreviations and words are used. These words and their translations into English are provided in the following table:

French	English
"bride"	
formes	word forms
nom féminin	feminine noun
Équitation	horse riding
emploi figuré	figurative use
emploi littéral	literal use
Voir	cf.
lâcher	release, let go
de vêtement	for clothing
en cuir	leather
de bonnet	for bonnet
Couture	sewing
de boutonnière	for buttonhole
de bouton	for button
de dentelle	for lace
Techniques	technology
de bielle	for connecting rod
de tuyau	for pipe
Médecine	medicine
"collerette"	
formes	word forms

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