

## 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 du propriété industriel*.
6. I have translated over 520 French and European patents.
7. I was awarded in 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 approfondie 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.

- *Early Application of Kinetic Theory of Gases to Star Clusters*. Journal for the History of Astronomy 53, no. 2 (May 2022): 141–62.
- *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 testified as an expert at trial or by deposition in one case in the previous four years.

- I provided a patent translation and a declaration entered in Case No. 3:17-CV-110-J-39MCR before the United States District Court for the Middle District of Florida in 2018.
- I provided a patent translation, declaration and deposition in an inter-parte review before the Patent Trial and Appeal Board of the USPTO in 2021.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

**Executed on:**

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Bruce D. Popp, PhD