



Declaration of Heike Holthaus

1. I, Heike Holthaus am a freelance translator working with the company, Lango.
2. I am a patent and technical translator of proven expertise in translating German to English / English to German and an active member of the American Translators Association as well as an active Qualified Member (MITI) of the Institute of Translation and Interpreting. I have been translating patents and technical texts since 2013 in various technical fields such as automotive, mechanical engineering, and electrical engineering. Through my work as a translator, my research for my work as well as personal experience, I have gained a good understanding of the automotive and the related terminology.
3. I have evaluated the accuracy of passages of the English translation (Exhibit 1006) of the German patent DE 197 08 304 A1 (Exhibit 1005), namely the paragraphs appearing at Column 1, lines 42–49 and Column 7, lines 8–19 of Exhibit 1005.

4. The word “Hubübersetzung” is used four times in Exhibit 1005, as follows (emphasis added):

- “Fig. 1 eine Vorrichtung zur Kraftübertragung ohne **Hubübersetzung**” (Exhibit 1005 at 1:44–45.)
- “Fig. 3 eine Vorrichtung zur Kraftübertragung mit **Hubübersetzung**.” (Exhibit 1005 at 1:48–19.)
- “Auf diese Weise wird eine **Hubübersetzung** zwischen der Auslenkung des Piezoaktors 1 und der Auslenkung des Antriebkolbens 3 erreicht.” (Exhibit 1005 at 7:11–13.)
- “Zudem ist es vorteilhaft, wenn die Fläche der dritten Membran 26 größer ist, als die Fläche der ersten Membran 6, so daß schon über die unterschiedlich großen Flächen der ersten Membran 6 und der dritten Membran 26 eine **Hubübersetzung** zwischen der Auslenkung des Piezoaktors 1 und der Auslenkung des Antriebkolbens 3 erreicht wird.” (Exhibit 1005 at 7:13–19.)

5. In the English translation (Exhibit 1006), the source word was not translated consistently throughout the document. “Hubübersetzung” was translated as “stroke translation” the first two times, as “stroke ratio” the third time, and as “stroke transmission” the fourth time.

6. In my experience, the best practice when translating a patent document is to translate a source term consistently with the same target term throughout the document, unless there is some context that imbues the word with a different meaning. Only if there is a difference in meaning should the same source term be translated differently within the document.

7. Here the word “Hubübersetzung” in Exhibit 1005 should be translated the same all four places in which it appears. There is no context which gives “Hubübersetzung” a different meaning between its use in column 1 and column 7. Accordingly, it was a translation error for it to have been translated differently in Exhibit 1006.
8. While I have considered the entirety of Exhibit 1005 and 1006 for the purpose of context, my evaluation focused on the above cited paragraphs. The absence of comments pertaining to other portions of the translation does not mean that I agree with the accuracy thereof.
9. I declare that all statements made herein to the best of my knowledge are true and that all statements made on information and belief are believed to be true, and that these statements were made with knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code.



Heike Holthaus

Date: April 26, 2024