No. 17-462

IN THE SUPREME COURT OF THE UNITED STATES

DARREN R. VASATURO

Petitioner,

vs.

SASHA PETERKA, ALSO KNOWN AS MIRA PETERKA, ET AL.

Respondents.

On Petition for a Writ of Certiorari to the Court of Appeals for the District of Columbia Circuit

APPLICATION FOR AN EXPANSION OF THE WORD LIMIT FOR FILING A PETITION FOR REHEARING

Petitioner, In *Pro Se*
Darren R. Vasaturo
502 Sun Lotus Ikeji
217 Owaricho, Nakagyoku
Kyoto, 604-0934
Japan

1. Petitioner, Darren Vasaturo, in *pro se*, hereby attests that the following is true and correct, under penalty of perjury. Petitioner respectfully requests an expansion of the word limit of the Petition for Rehearing by 2,500 words for a total of 5,500 words.

2. Petitioner's grounds for petitioning for a rehearing consist of three intervening circumstances and substantial matters not yet presented to the Court.

3. The first matter is the discovery of a business card presented to him by defendant Abdelsamad, who vehemently denied knowing Petitioner or ever meeting Petitioner's friend David Chapman, as well as the fact that he described himself as being the son of a Sudanese diplomat. The existence of the business card in Petitioner's possession is further proof that Petitioner knew Abdelsamad, and the Sudanese aristocracy related content is further proof that Abdelsamad lied to the Court.

4. The second matter pertains to the fact that the two individual named as having intruded into Petitioner's cultural activities and daily life were being supported by a teacher named Akisato (aka Koumei) Mizuno ("Mizuno") whom Petitioner has taken lessons from about 3-4 times a year for the past two years. Though Petitioner had suspected his peripheral involvement as an employee of the Ko-an-cho (https://en.wikipedia.org/wiki/Public_Security_Intelligence_Agency; Petitioner had

been referring the wrong character ("省"read "sho", instead of "庁", read "cho"; the difference approximately corresponds to "department" vs. "agency", the former being used in China in this context) for the third character in the abbreviated name of the agency, proof through verbal and other conduct was not had until Mizuno lied to Petitioner and the lies were provisionally discovered to be such.

5. The third matter pertains to Petitioner's interactions with yet another translation company suspected to be a CIA front covertly acting in the translation and localization sector, with an emphasis on intellectual property. Petitioner applied for an extension of the time to file the Petition for a Writ of Certiorari partly due to a drastic change in his employment status under suspect circumstances. Petition continued to look for work while drafting the Petition for a Writ of Certiorari, to which end he responded to an advertisement (attached) placed on the Job Board of the Japan Association of Translators (Petitioner is a member) website for freelance translators in Life Sciences (i.e., pharmaceuticals, clinical trials, etc.). The name of the company is "Welocalize", with a subsidiary called Park IP. The company is a US company headquartered in Maryland, with its main operational office apparently in New York City, and approximately twenty offices worldwide.

6. Petitioner submitted a resume and was told that they were impressed with my

range of experience, particularly in patents, and requested that Petitioner sign a so-called Nondisclosure Agreement (NDA: attached). Petitioner agreed to sign, though the NDA contained some unusual stipulations, and was from the New York office and in English instead of Japanese. They encouraged Petitioner to take a patent translation trial, to which he agreed, indicating that though he had experience translating all three specified technical fields (i.e., mechanical, electrical, chemical field), he had the most experience in electrical. The coordinator, Aki Fujimoto ("Fujimoto"), responded that they had presently discovered that there were portions of the electrical patent translation trial that need to be revised, and asked me to wait until that was completed. Petitioner replied that he was free over the weekend and would take the Life Sciences trial, which was what I had initially applied for anyway. Fujimoto agreed and sent the trial. A week later I submitted it, two weeks after that Fujimoto informed me that I had passed, and Petitioner registered with the company as a freelance translator, though they never sent me a contract. Fujimoto failed to offer me anything in the Life Sciences field to translate, however, and though I was working on the Petition for a Writ of Certiorari, Petitioner had to find work and it seemed like a reasonable opportunity, so in the interim, Petitioner offered to take another trial, and ended up taking their legal translation trial after Fujimoto sent that

instead of a patent translation trial in one of the other fields.

7. After Petitioner submitted the legal translation trial, which consisted of a contrived Supreme Court decision including obvious mistakes so glaring Petitioner thought they must be deliberate, Fujimoto emailed Petitioner that a large project was about to come through the pipeline for electrical patents, and asked Petitioner to translate a substantial excerpt of what she claimed was an extract of a patent specification constituting part of the actual project. She asked me to complete the trial as soon as possible, and sent the entire 41-page specification with cover (attached, with first two pages of specification) as a reference. The cover indicated the name of the purported inventor (Kiichi Naito), his company (i.e., the "applicant": SZ DJI Technology Co. Ltd.), and the inventor's agent (Ryuka IP Law Firm), and detailed filling charges for a PCT application purportedly (apparently) filed on September 8, 2016. Since it was a PCT application, Petitioner decided to look up the application on the World Intellectual Property Organization (WIPO)'s website to check the Abstract translation for terminology, etc., as he has been doing for the past 8 years. WIPO provides a diverse search engine called Patentscope (https://patentscope.wipo.int/search/en/search.jsf), which is searchable in multiple languages for various types up data (e.g., the name of the inventor, applicant, etc.),

using various parameters, etc. To his surprise, it was not there (no results for the aforementioned inventor, and no corresponding result for the company in English, or the title of the invention in Japanese), nor did Google return any hits for the Japanese application, and the cover did not include the application number for the filling with the Japanese Patent Office. There was little time, however, so Petitioner simply looked up some related specifications/patents and started working on the translation. Petitioner has since found one PCT patent application from that company in Japanese, filed by the above-named law firm, but by a different inventor (https://patentscope.wipo.int/search/en/detail.jsf?docId=WO2017203646&recNum=8&office=&queryString=FP%3A%28SZ+DJI+Technology%29&prevFilter=&sortOption=Pub+Date+Desc&maxRec=919):

Pub. No.: WO/2017/203646
International Application No.: PCT/JP2016/065537
Publication Date: 30.11.2017
International Filing Date: 26.05.2016
IPC: ***H04N 5/232*** (2006.01), ***B64C 39/02*** (2006.01), ***B64D 47/08*** (2006.01), ***G03B 15/00*** (2006.01)
Applicants:
SZ DJI TECHNOLOGY CO., LTD [CN/JP]; 9F, Tradepia Odaiba, 2-3-1, Daiba, Minato-ku, Tokyo 1350091 (JP)
Inventors: YAHIRO Minoru; (JP)
Agent: RYUKA IP LAW FIRM; 22F, Shinjuku L Tower, 1-6-1, Nishi-Shinjuku, Shinjuku-ku, Tokyo 1631522 (JP)
Priority Data:
Title

(EN) IMAGE CAPTURE CONTROL DEVICE, SHADOW POSITION SPECIFICATION DEVICE, IMAGE CAPTURE SYSTEM, MOBILE OBJECT, IMAGE CAPTURE CONTROL METHOD, SHADOW POSITION SPECIFICATION METHOD, AND PROGRAM
(JA) 撮像制御装置、影位置特定装置、撮像システム、移動体、撮像制御方法、影位置特定方法、及びプログラム

Petitioner cross searched all PCT filings by Ryuka IP Law firm (194 applications), and that is the only one for applicant SZ DJI Technology Co. Ltd.

8. With the exception of one awkward Claim, the material was fairly manageable (though all Claims except for one paragraph), so I completed the fairly lengthy trial over the weekend. Fujimoto got back to me saying they had assigned the project to another translator in order to satisfy the clients "special desires" (related to "natural", easy-to-read English). Fujimoto did not provide an evaluation of the content of the translation, and when I queried her further on the matter, being unsatisfied with her somewhat inept and completely vague reason, particularly due to the fact that the trial had consisted primarily of Claims, which are generally required to be faithfully translated close to the original, with some countries, etc. (e.g. the EU) requiring certification thereof. Meanwhile, Fujimoto never got back to Petitioner about the legal trial, and told him she had never received it (after having confirmed receipt in an email the same day Petitioner submitted it), whereupon Petitioner indicated the email to which it was attached, etc., She found it and eventually got back to me stating that I

had failed the legal translation trial, citing dubious reasons and extremely strict criteria. Furthermore, she had said that the patent translation was being checked to see if they could use me as a "regular" patent translator, implying that only their client had evaluated my translation with a yes or no, but Fujimoto refused to answer that question when Petitioner asked it. When Fujimoto got back to Petitioner saying that they would "pass" on registering him as a patent translator, refusing to give any reasons, Petitioner plied her for information, stating that he suspected she and her company were engaged in fraudulent activities. Petitioner specifically asked for the Application Number of the Japanese filing of the purported actual patent specification he was asked to translate, and she stated that she would have to check to see if it was OK to give out "internal" information. Petition responded (Thursday, November 30th, requesting an answer by the end of Friday) that her client's details (i.e., disclosed in the cover, which Petitioner had no need to see and is not information generally disclosed to the translator) and billing information might possibly be considered "internal information," but that the patent application filing number was a matter of public record. Petitioner further indicated that the purported application could not be found on WIPO's website, and seemed not to exist anywhere. Fujimoto has not responded at all.

9. The first two matters described above should not require more than approximately 1,500 words in total to describe; however, the third item is rather involved, and could easily consume 5,000 words of text or more, as this Application demonstrates (Petitioner has approximately twenty pages of emails to sort out, and translate excerpts, as well as the three trial translations, etc.). Petitioner intends to facilitate a lower word count of approximately 3,500-4,000 words for the third matter by making effective use of the Appendix and a circumstance related to the fact that Petitioner is compelled to file a civil action in the Japanese court in relation to the third matter. Japanese Rules of Civil Procedure provide for a pre-filing limited form of discovery termed an "Inquiry Prior to the Filing of an Action" by a person intending to file a civil action. Article 132 Paragraph 2 of said Code reads:

> Article 132-2 (1) If a person that intends to file an action has provided advance, written notice to the would-be defendant in the action (hereinafter referred to as "advance notice" in this Chapter) of the filing of an action, the person that has provided the advance notice (hereinafter referred to as the "person providing advance notice" in this Chapter), within four months after providing that notice and before filing of the action, may specify a reasonable time frame for response and direct a written inquiry to the person that has received the advance notice, so as to elicit from that person a written response with regard to particulars that will clearly be necessary for preparing allegations or proof if the action is filed....

Due to the fact that the timeline for filing the Petition for Rehearing is tight, Petitioner aims to draft the document for filling with the Japanese court describing

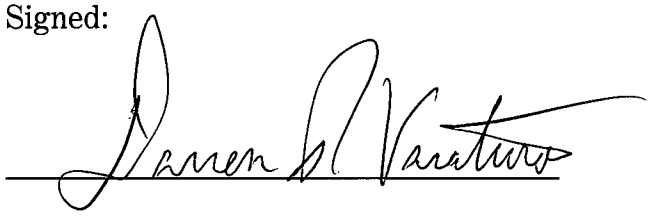
the gist of his complaint in English, first, so he can submit that in the Appendix and refer to it in the Petition, and subsequently translate it into Japanese for sending to the defendants.

10. Wherefore, Petitioner respectfully requests an expansion of the word limit by 2,500 words to 5,500 words.

Dated: December 5, 2017

Respectfully Submitted,

Signed:



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Additional material from this filing is available in the Clerk's Office.