UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

SYMANTEC CORP. Petitioner

v.

THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK Patent Owner

CASE IPR2015-00375 Patent 8,074,115

COLUMBIA'S PATENT OWNER PRELIMINARY RESPONSE UNDER 37 C.F.R. § 42.107

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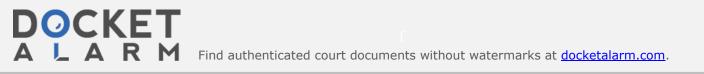
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V.	THE PETITION FAILS TO ESTABLISH A REASONABLE LIKELIHOOD OF PREVAILING ON ANY CHALLENGED PATENT CLAIM					
	А.	A. The Board Should Deny The Petition Because Petitioner Has Not Established The Level Of Ordinary Skill In The Art				
	В.	The Petition Should Be Denied Under 35 U.S.C. § 325(d) Because The Primary Reference Khazan Has Already Been Considered During Prosecution And Found Not To Invalidate Any Claims				
	C.	Institution Should Be Denied On Petitioner's Ground 1 Because Khazan Does Not Anticipate Claims 22, 25, 27-29, 32, 35-39, Or 42				
		1. Khazan does not disclose "a model of function calls" as all claims challenged in Ground 1 require				
		 Khazan does not disclose "identifying/identifies a function call as anomalous" as all claims challenged in Ground 1 require				

	3.	Khazan does not disclose "program-level function calls" as required by all claims of Ground 1 under Petitioner's apparent interpretation of the term				
	4.	Khazan does not disclose "the model reflects attacks gainst the at least a part of the program" as recited by laims 8, 18, 29, 39				
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	1.	Neither Khazan nor Arnold discloses "comparing a function call made in the emulator to a model of function calls for the at least a part of the program" as recited by independent claims 1, 11, and 21, and required by all challenged claims				
	2.	Neither Khazan nor Arnold discloses "identifying the function call as anomalous based on the comparison" as ecited by independent claims 1, 11, and 21, and required by all challenged claims				
	3.	Neither Khazan nor Arnold discloses "upon identifying the anomalous function call, notifying an application community that includes a plurality of computers of the nomalous function call" as recited by independent laims 1, 11, and 21, and required by all challenged laims				

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		(a)	Arnold does not describe notifying an "application community"		
		(b)	Arnold does not disclose, "upon identifying the anomalous function call," notifying any computer "of the anomalous function call"		
	4.	Neither Khazan nor Arnold discloses "the model reflects attacks against the at least a part of the program" as recited by dependent claims 8 and 18			
	5.		oner has failed to establish that a POSITA would been motivated to combine Khazan with Arnold35		
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	1.	indep	oner fails to establish obviousness of the endent claims upon which the claims challenged in nd 3 depend		
	2.	Petitioner fails to allege a combination of Khazan with Arnold and Agrawal that meets the claims as a whole			
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