UNITED STATES PATENT AND TRADEMARK OFFICE

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BEFORE THE PATENT TRIAL AND APPEAL BOARD

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SYMANTEC CORPORATION
Petitioner

v.

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

_____

CASE IPR2015-00375
Patent 8,074,115

_____

DECLARATION OF MICHAEL R. FLEMING

Mail Stop "PATENT BOARD"
Patent Trial and Appeal Board
U.S. Patent and Trademark Office
P.O. Box 1450
Alexandria, VA 22313-1450

1.	My name is Michael R. Fleming. I am an attorney at Irell &

Manella LLP, and I am a member in good standing of the State Bar of Virginia.

I have personal knowledge of the facts set forth in this Declaration.

2.	Ex. 2024 is a true and correct copy of excerpts from the Microsoft

Computer Dictionary, Fifth Edition, 2002, including definitions of the term

"program," that I used at the deposition of Dr. Goodrich.

3.	Ex. 2025 is a true and correct copy of excerpts from the McGraw-

Hill Dictionary of Scientific and Technical Terms, Sixth Edition, 2003,

including a definition of the term "model." I used a substantially similar

exhibit at the deposition of Dr. Goodrich. This version is an improved scan of

the material used at the deposition.

4.	Ex. 2026 is a true and correct copy of excerpts from the Microsoft

Computer Dictionary, Fifth Edition, 2002, including a definition of the term

"function call," that I used at the deposition of Dr. Goodrich.

5.	Ex. 2027 is a true and correct copy of a printout of the web page

VMWare, What is virtualization? Virtualization 101 | United States,

http://www.vmware.com/virtualization/how-it-works.html, accessed and

printed on Sept. 27, 2015, that I used at the deposition of Dr. Goodrich.

6.	Ex. 2028 is a true and correct copy of United States Provisional

Patent Application 60/730,289.

7.   Ex. 2029 is a true and correct copy of the transcript of the deposition of Dr. Michael T. Goodrich taken Sept. 28, 2015 and Sept. 30, 2015 in IPR2015-00375 and IPR2015-00377.

8.   Ex. 2030 is a true and correct copy of the declaration of Prof. George Cybenko dated Oct. 8, 2015.

9.   Ex. 2031 is a true and correct copy of the declaration of Scott M. Lewandowski dated Oct. 7, 2015.

10.   Ex. 2032 is a true and correct copy of a printout of the web page Stelios Sidiroglou-Douskos Homepage, http://people.csail.mit.edu.edu/stelios, accessed and printed on Oct. 7, 2015.

11.   Ex. 2033 is a true and correct copy of Eric Fosler-Lussier, *Markov Models and HIdeen Markov Models: A Brief* Tutorial, TR-98-041, December 1998, http://di.ubi.pt/~jpaulo/competence/tutorials/hmm-tutorial-1.pdf.

12.   Ex. 2034 is a true and correct copy of Prof. George Cybenko's *Curriculum Vita* dated August 2015.

13.   Ex. 2035 is a true and correct copy of John Shawe-Taylor and Blaz Zlicar, *Novelty Detection with One-Class Support Vector Machines*, in *Advances in Statistical Models for Data Analysis*, Studies in Classification, Data Analysis, and Knowledge Organization, 2015.

14.   Ex. 2036 is a true and correct copy of the IEEE Membership and Subscription History of Prof. George Cybenko.

15.   Ex. 2037 is a true and correct copy of a printout of the web page

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http://www.ieee.org/membership_services/membership/fellows/index.html,

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16.   Ex. 2038 is a true and correct copy of William Landi,

Undecidability of Static Analysis, in *ACM Letters on Programming Languages*

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17.   Ex. 2039 is a true and correct copy of a printout of the web page

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18.   Ex. 2040 is a true and correct copy of a printout of the web page

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20.   Ex. 2042 is a true and correct copy of excerpts from Random

House Webster's College Dictionary, 2005.

21.   Ex. 2043 is a true and correct copy of Jack Lo, VMware and CPU

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http://download3.vmware.com/vmworld/2005/pac346.pdf.

22.   Ex. 2044 is a true and correct copy of VMware, *Understanding*

Full Virtualization, Paravirtualization, and Hardware Assist, 2007, available

at https://www.vmware.com/files/pdf/VMware_paravirtualization.pdf.

23.   Ex. 2045 is a true and correct copy of a printout of the web page

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24.   Ex. 2046 is a true and correct copy of a printout of the web page

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25.   Ex. 2047 is a true and correct copy of a printout of the web page

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http://www.griffincaprio.com/blog/2006/08/virtual-machines-virtualization-vs-

emulation.html (Aug. 16, 2006), accessed and printed on Oct. 7, 2015.

26.   Ex. 2048 is a true and correct copy of Lee M. Rossey, Robert K.

Cunningham, David J. Fried, Jesse C. Rabek, Richard P. Lippmann, Joshua W.

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