


AFFIDAVIT OF PAMELA STANSBURY

Pamela Stansbury being of full age and duly sworn, deposes and says as follows:

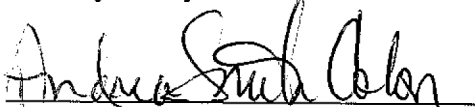
1. I am an employee of the Cornell University Library (“the Library”), and specifically the Original Cataloging Unit, located at Cornell University, Ithaca, New York 14853. I am familiar with the policies and procedures of the Library as they relate to the receipt, cataloging, and tracking of books and I have personal knowledge of the facts set forth below.
2. I am the Administrative Supervisor in the Original Cataloging Unit, which maintains bibliographical and processing information for many historical documents. I have held such position since 1996.
3. Included in the Library’s historical collection are various publications. As part of that collection, the Library maintains custody of an original copy of the proceedings of the **Thirty-Seventh Annual Allerton Conference on Communication, Control and Computing, September 22-24, 1999** which contains the papers **Irregular turbocodes / by Brendan J. Frey and David J. C. MacKay**, and **The Serial Concatenation of Rate-1 Codes Through Uniform Random Interleavers / by H. D. Pfister and P. H. Siegel**.
4. Wilmer Cutler Pickering Hale and Dorr LLP requested information about **Irregular turbocodes / by Brendan J. Frey and David J. C. MacKay** and **The Serial Concatenation of Rate-1 Codes Through Uniform Random Interleavers / by H. D. Pfister and P. H. Siegel** – specifically when these items were first made publicly available by the Library. Based upon my review of the Library’s records and my knowledge of the Library’s standard procedures, **Irregular turbocodes / by Brendan J. Frey and David J. C. MacKay** and **The Serial Concatenation of Rate-1 Codes Through Uniform Random Interleavers / by H. D. Pfister and P. H. Siegel** were publicly available at the Cornell University Library as of March 20, 2000.

5. Wilmer Cutler Pickering Hale and Dorr LLP also requested information about when the Library received its copy of **Irregular turbocodes / by Brendan J. Frey and David J. C. MacKay** and **The Serial Concatenation of Rate-1 Codes Through Uniform Random Interleavers / by H. D. Pfister and P. H. Siegel**. Based upon my review of the Library's records and my knowledge of the Library's standard procedures, the Library received its original copy of the proceedings of the **Thirty-Seventh Annual Allerton Conference on Communication, Control and Computing, September 22-24, 1999** containing both **Irregular turbocodes / by Brendan J. Frey and David J. C. MacKay** and **The Serial Concatenation of Rate-1 Codes Through Uniform Random Interleavers / by H. D. Pfister and P. H. Siegel** before March 20, 2000. The Library was free to place this publication in circulation to the public upon its receipt.
6. I have reviewed the document filed as Replacement Exhibit 1002 in IPR2017-00210 and the document filed as Replacement Exhibit 1202 in IPR2017-00219. Both of these documents are true, complete, and accurate reproductions of excerpts from the Library's original copy of the proceedings of the **Thirty-Seventh Annual Allerton Conference on Communication, Control and Computing, September 22-24, 1999**, including the table of contents in its entirety (appearing on pages iv-xvi of the proceedings) and **Irregular turbocodes / by Brendan J. Frey and David J. C. MacKay** in its entirety (appearing on pages 241-248 of the proceedings).

 (signature)

Pamela J. Stansbury (name printed)

Sworn to before me this
12th day of July 2017


Notary Public

ANDREA DENISE SMITH COLON
NOTARY PUBLIC-STATE OF NEW YORK
Tompkins County
Registration #016146370000