

Title	Legal regulation of the software "patentable subject matter" requirement in the US and in Europe: The need for certainty, predictability and uniformity
Authors	Deschamps, Carole
Publication date	2013
Original Citation	Deschamps, C. 2013. Legal regulation of the software "patentable subject matter" requirement in the US and in Europe: The need for certainty, predictability and uniformity. PhD Thesis, University College Cork.
Type of publication	Doctoral thesis
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LEGAL REGULATION OF THE SOFTWARE "PATENTABLE SUBJECT
REQUIREMENT
MATTER" IN THE US AND IN EUROPE - THE NEED FOR CERTAINTY, PREDICTABILITY
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