

## APPENDIX

## A CONNECTING MSE AND L2

**Lemma 1.** Consider the parameters of a model to be  $\theta \in \mathbb{R}^d$ . A noisy approximation of the  $L^2$ -norm of parameters  $\theta$  can be represented as an average of Mean Squared Error between parameters  $\theta$  and samples  $z_i \in \mathbb{R}^d$  from standard normal,  $\mathcal{N}(0, \mathbb{I}_d)$ . In other words,

$$\lim_{n \rightarrow \infty} \frac{1}{n} \sum_{i=1}^n \|\theta - z_i\|_2^2 = \|\theta\|_2^2 + d$$

*Proof.* Consider  $Y_i = \|\theta - z_i\|_2^2$  to be a random variable. Consider  $\mathbb{E}[\cdot]$  as the function calculating the expectation of a random variable. As  $z_i$  are i.i.d. samples of standard normal and  $\theta$  is a constant,  $Y_i$  are also i.i.d. samples. Using Strong Law of Large Numbers (Loève (1977)), we can say that:

$$\Pr \left[ \lim_{n \rightarrow \infty} \frac{1}{n} \sum_{i=1}^n Y_i = \mathbb{E}[Y_i] \right] = 1 \quad (7)$$

Now we would show that  $\mathbb{E}[Y_i] = \|\theta\|_2^2 + d$ , where  $d$  is the dimension of the parameter  $\theta$ .

$$\begin{aligned} \mathbb{E}[Y_i] &= \mathbb{E}[\|\theta - z_i\|_2^2] \\ &= \mathbb{E}[\theta^T \theta - z_i^T \theta - \theta^T z_i + z_i^T z_i] \\ &= \mathbb{E}[\theta^T \theta] - 2\mathbb{E}[z_i^T \theta] + \mathbb{E}[z_i^T z_i] \end{aligned} \quad (8)$$

$$\begin{aligned} &= \theta^T \theta - 2 \sum_j \theta_j \mathbb{E}[z_{ij}] + \sum_j \mathbb{E}[z_{ij}^2] \\ &= \|\theta\|_2^2 + \sum_j 1 \end{aligned} \quad (9)$$

$$= \|\theta\|_2^2 + d \quad (10)$$

Here, Equation 8 is using linearity property of expectation and Equation 9 uses the fact that  $\mathbb{E}[z_{ij}] = 0$  and  $\mathbb{E}[z_{ij}^2]$  is nothing but variance of that variable  $z_{ij}$ , which is equal to 1.

Based Equation 7 and Equation 10, we can say that,

$$\lim_{n \rightarrow \infty} \frac{1}{n} \sum_{i=1}^n \|\theta - z_i\|_2^2 = \|\theta\|_2^2 + d$$

□

**Lemma 2. Bernstein's inequality** (refer to Vershynin (2018)) Consider  $X_1, X_2, \dots, X_n$  as independent, mean-zero and sub-exponential random variables. Define  $S_n = \sum_{i=1}^n X_i$ . Then for every  $\epsilon \geq 0$ , we have

$$\Pr[|S_n| \geq \epsilon] \leq 2 \exp \left[ -c \min \left( \frac{\epsilon^2}{\sum_{i=1}^n \|X_i\|_{\psi_1}^2}, \frac{\epsilon}{\max_i \|X_i\|_{\psi_1}} \right) \right]$$

where  $c > 0$  is a constant and  $\|\cdot\|_{\psi_1}$  is 1-sub-exponential norm of a random variable.

**Theorem 3.** Consider  $\forall i, Y_i \in \mathbb{R}^d$  is a random variable defined as  $Y_i = \|\theta - z_i\|_2^2$ , where  $z_i \sim \mathcal{N}(0, \mathbb{I}_d)$ . Define  $S_n = \sum_{i=1}^n Y_i$ . Then, with a relative deviation  $\delta$ ,

$$\Pr[S_n \geq (1 + \delta)\mathbb{E}[S_n]] \leq \frac{2}{e^{\Theta(\min(\delta^2 nd, \delta n \sqrt{d}))}} \quad (11)$$

where  $\Theta(\cdot)$  denotes the asymptotic average bound, commonly known as Big-Theta notation.

*Proof.* We first need to understand the distribution of the random variable,  $Y_i$ . As  $Y_i$  is the  $L^2$ -norm of a shifted  $d$ -dimensional standard normal distribution,  $Y_i$  follows a *non-central chi-squared distribution* with  $d$  degree of freedom and non-centrality parameter  $\lambda = \|\theta\|_2^2$

$$Y_i \sim \chi_d^2(\lambda)$$

We know that the chi-square random variable is a sub-exponential random variable (Vershynin, 2018). We use the Lemma 2 to find the rate of convergence and its dependency with  $n$  and  $d$ . To apply Lemma 2, we first need to centre the random variable,

$$X_i = Y_i - \mathbb{E}[Y_i] = \|\theta - z_i\|_2^2 - (\|\theta\|_2^2 + d) = \|\theta - z_i\|_2^2 - (\lambda + d) \quad (12)$$

Now,  $X_i$  is a mean-zero sub-exponential random variable. Now, we need to compute the 1-sub-exponential norm of  $X_i$ . The chi-squared distribution is known to have a finite sub-exponential norm, but it's complex to compute, so we use an upper bound for it. Vershynin (2018) For a sub-exponential random variable with variance  $\sigma^2$ , sub-exponential norm satisfies,  $\|X\|_{\psi_1} \leq C\sigma$  where  $C$  is some constant.

$$\text{Var}(X_i) = \text{Var}(\|\theta - z_i\|_2^2) = 2(d + 2\lambda) \quad (13)$$

As  $\|\theta - z_i\|_2^2$  is a non-central chi-square distribution, we directly use its variance formula to get Equation 13. Now, for  $X_i$ , 1-sub-exponential norm is

$$\|X_i\|_{\psi_1} \leq C\sqrt{2(d + 2\lambda)} \quad (14)$$

Applying Bernstein's inequality (Lemma 2) to  $X_i$ 's, we get,

$$\begin{aligned} \Pr \left[ \left| \sum_{i=1}^n X_i \right| \geq \epsilon \right] &\leq 2 \exp \left[ -c \min \left( \frac{\epsilon^2}{2n(d + 2\lambda)}, \frac{\epsilon}{\sqrt{2(d + 2\lambda)}} \right) \right] \\ \Pr \left[ \left| \sum_{i=1}^n (Y_i - \mathbb{E}[Y_i]) \right| \geq \epsilon \right] &\leq 2 \exp \left[ -c \min \left( \frac{\epsilon^2}{2n(d + 2\lambda)}, \frac{\epsilon}{\sqrt{2(d + 2\lambda)}} \right) \right] \end{aligned} \quad (15)$$

To analyze the upper tail bound, consider  $S_n = \sum_{i=1}^n Y_i$ .

$$\Pr \left[ \sum_{i=1}^n (Y_i - \mathbb{E}[Y_i]) \geq \epsilon \right] = \Pr [S_n \geq \mathbb{E}[S_n] + \epsilon] \quad (16)$$

Let's define relative deviation  $\delta$  as

$$\delta = \frac{\epsilon}{\mathbb{E}[S_n]} \Rightarrow \epsilon = \delta \mathbb{E}[S_n] \Rightarrow \epsilon = \delta n(d + \lambda) \quad (17)$$

Using Equation 15, Equation 16 and Equation 17 we can write that,

$$\Pr [S_n \geq (1 + \delta) \mathbb{E}[S_n]] \leq 2 \exp \left[ -c \min \left( \frac{[\delta n(d + \lambda)]^2}{2n(d + 2\lambda)}, \frac{\delta n(d + \lambda)}{\sqrt{2(d + 2\lambda)}} \right) \right] \quad (18)$$

$$\leq 2 \exp \left[ -c \min \left( \frac{\delta^2 n(d + \lambda)^2}{2(d + 2\lambda)}, \frac{\delta n(d + \lambda)}{\sqrt{2(d + 2\lambda)}} \right) \right] \quad (19)$$

Consider  $\theta_j$  to be the value of  $\theta$  on  $j^{th}$  index. Then

$$\lambda = \|\theta\|_2^2 \geq d\theta_{min}^2 \quad \text{where} \quad \theta_{min} = \min_{1 \leq j \leq d} \theta_j$$

$$\lambda = \|\theta\|_2^2 \leq d\theta_{max}^2 \quad \text{where} \quad \theta_{max} = \max_{1 \leq j \leq d} \theta_j$$

$$\begin{aligned} \frac{d^2(\theta_{min}^2 + 1)^2}{d(2\theta_{min}^2 + 1)} &\leq \frac{(d + \lambda)^2}{d + 2\lambda} \leq \frac{d^2(\theta_{max}^2 + 1)^2}{d(2\theta_{max}^2 + 1)} \\ d \left( \frac{(\theta_{min}^2 + 1)^2}{2\theta_{min}^2 + 1} \right) &\leq \frac{(d + \lambda)^2}{d + 2\lambda} \leq d \left( \frac{(\theta_{max}^2 + 1)^2}{2\theta_{max}^2 + 1} \right) \end{aligned}$$

$$c_1 \cdot d \leq \frac{(d + \lambda)^2}{d + 2\lambda} \leq c_2 \cdot d \quad \text{where } c_1, c_2 > 0 \text{ are some constants}$$

$$\frac{(d + \lambda)^2}{d + 2\lambda} \approx \Theta(d)$$

Similarly,  $\frac{d+\lambda}{\sqrt{d+2\lambda}} \approx \Theta(\sqrt{d})$

Based on the above claims, Equation 19 can be rewritten as,

$$\Pr[S_n \geq (1 + \delta)\mathbb{E}[S_n]] \leq 2 \exp[-c \cdot \Theta(\min(\delta^2 n d, \delta n \sqrt{d}))] \quad (20)$$

for some absolute constant  $c > 0$ .  $\square$

From the Theorem 3, we can observe that for a fixed deviation  $\delta$ , the probability that  $S_n$  is far from  $\mathbb{E}[S_n]$  is inversely proportional to  $n \times d$ .

## B HYPERNETWORK

Hypernetworks  $\mathcal{H}(\cdot; \phi)$  are a class of neural networks designed to generate the parameters of another network, referred to as the target network  $\mathcal{C}(\cdot; \theta)$ . Introduced by Ha et al. (2017), hypernetworks improve parameter efficiency and adaptability in machine learning models by learning a mapping from task-specific embeddings  $e_t$  to the weights of the target network  $\theta_t$ , instead of directly optimizing the target network’s weights. This enables greater flexibility in handling diverse tasks.

The hypernetwork framework comprises two main components:

1. **Hypernetwork:** A neural network responsible for generating the weights of the target network. In UnCLE, we employ a multi-layer perceptron as the hypernetwork.
2. **Target Network:** The primary network that performs the desired classification tasks using weights generated by the hypernetwork. Our experiments utilize both ResNet18 and ResNet50 as the target network.

When a learning request is encountered, the hypernetwork generates the main network parameters conditioned on the task embedding  $e_t$ . To achieve this, the hypernetwork parameters  $\phi$  and the task embedding  $e_t$  are optimized by minimizing the task-specific loss  $\mathcal{L}_{task}$ , which is computed using the data set  $D_t$  corresponding to the current task. In our case, the task-specific loss is the Cross Entropy loss.

As tasks are learned continually, to ensure that knowledge of previously learned tasks is preserved, a regularization term is introduced. This term enforces the hypernetwork to generate consistent parameters for those tasks by aligning the output of the current hypernetwork with that of a frozen copy of the hypernetwork, denoted by  $\phi^*$ , saved prior to training on the current task. The regularization term leverages a knowledge distillation approach, comparing the outputs of the current and frozen hypernetworks for the embeddings of previous tasks.

The overall learning objective is defined as follows, where  $\beta$  controls the strength of the regularization:

$$\arg \min_{\phi, e_t} \mathcal{L}_{task} + \beta \cdot \mathcal{L}_{reg}, \text{ where } \mathcal{L}_{reg} = \frac{1}{t-1} \sum_{t'=1}^{t-1} \|\mathcal{H}(e_{t'}; \phi^*) - \mathcal{H}(e_{t'}; \phi)\|_2^2 \quad (21)$$

Here,  $\mathcal{L}_{reg}$  represents the regularization term, calculated as the average squared difference between the outputs of the frozen and current hypernetworks for all previous tasks. This approach ensures that the parameters of the hypernetwork remain stable for previously learned tasks, effectively mitigating catastrophic forgetting.

They key benefit of using task embeddings to generate task-specific parameters results in negligible parameter growth as new tasks are added, ensuring high parameter efficiency. Since the hypernetwork generates all task-specific parameters and its core parameters are shared across tasks, it also facilitates inter-task knowledge transfer. This allows improvements in one task to benefit others.

A schematic representation of this architecture is presented in Figure B.7.

The hypernetwork consists of three hidden layers with dimensions 128, 256, and 512. Given the large size of the generated ResNet parameters, the hypernetwork’s last layer becomes excessively

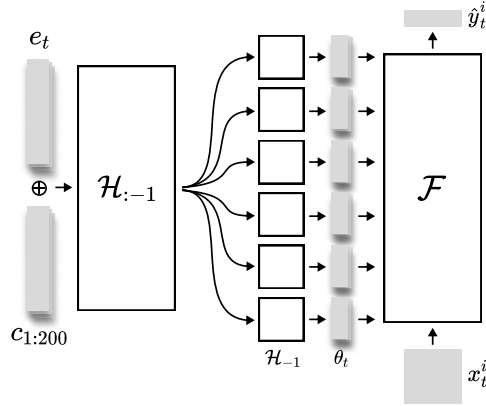


Figure B.7: Schematic of the architecture showcasing the task  $e_{T_t}$  and chunk embeddings  $c$ , the hypernetwork and its various heads  $\mathcal{H}$ , the generated parameters  $\theta$ , the ResNet classifier  $\mathcal{F}$  and, the input image  $x_t^i$  and the predicted output  $\hat{y}_t^i$ .

large. To address this, we partition the main network parameters into smaller chunks and generate them separately. This significantly reduces the size of the hypernetwork’s last layer, thereby minimizing the overall size of the hypernetwork.

Similar to how the hypernetwork generates task-specific networks by conditioning on unique task embeddings, it generates large networks in chunks by conditioning on unique chunk embeddings. These chunk embeddings are concatenated with task embeddings to create unique task-chunk embedding pairs, which generate the corresponding chunk of the parameters for the specific task network.

The chunk embeddings, like task embeddings, are learned through backpropagation. To prevent catastrophic forgetting, the chunk embeddings are frozen after the first task. In our implementation, both chunk and task embeddings have a dimension of 32. We found that dividing each task-specific network into 200 chunks strikes an effective balance between efficiency and performance.

Building on the previously described approach of generating task-specific network parameters in chunks, the hypernetwork further optimizes parameter generation by dividing its final layer into specialized heads. Each head is responsible for generating a specific type of parameter required for the target network: network weights, batch normalization parameters, and residual connection parameters. By explicitly separating the generation of different parameter types, the hypernetwork avoids generating unnecessary or redundant parameters. Each head is optimized to produce only the parameters relevant to its designated role, reducing computational overhead and memory usage.

The chunk-based parameter generation approach described earlier is seamlessly integrated with the specialized heads. For each chunk, the hypernetwork’s heads produce only the subset of parameters required for that chunk, whether it is network weights, batch normalization parameters, or residual connection parameters. By generating parameters in chunks and assigning specialized roles to the final layer heads, the hypernetwork achieves a high degree of parameter efficiency. This design ensures that the size of the hypernetwork remains manageable even when generating large target networks like ResNet18 or ResNet50.

This architecture strikes an effective balance between scalability, modularity, and efficiency, making it well-suited for tasks requiring the generation of large and complex networks. The schematic of the hypernetwork used is described in Figure B.7.

## B.1 INITIALISATION

Classic weight initialization methods such as the Xavier Initialisation and the Kaiming He Initialisation, when applied on the hypernetwork, fail to generate classifier parameters in the correct scale. To counteract this, we employ Hyperfan Initialization, a principled parameter initialization technique

for hypernetworks proposed by Chang et al.. The goal of hyperfan initialization is to result in the generated parameters themselves following Kaiming He initialization.

## C HYPERPARAMETER TUNING

### C.1 LEARNING HYPERPARAMETER: BETA

We perform a hyperparameter search to determine the best value for  $\beta$ . We perform experiments with  $\beta$  values 1, 0.1, 0.01, and 0.001 and select the best-performing value for each dataset. The results of the hyperparameter search are presented in Table C.4:

Dataset	1	0.1	0.01	0.001
Permuted MNIST	96.24	<b>96.68</b>	96.64	96.52
Five Datasets	94.46	94.42	94.13	<b>94.54</b>
CIFAR-100	48.58	<b>72.16</b>	52.62	15.72
TinyImageNet	34.33	35.74	<b>53.7</b>	48.49

Table C.4: Results of tuning hyperparameter  $\beta$ . The highest average accuracy values are highlighted in bold.

As apparent, the chosen values for  $\beta$  are as follows: 1e-2 for TinyImageNet, 1e-3 for Five Datasets and 1e-1 for both Permuted MNIST and CIFAR-100.

### C.2 UNLEARNING HYPERPARAMETERS: GAMMA & BURN-IN

We perform a hyperparameter search to determine the ideal value for  $\gamma$ . Our search range comprises the  $\gamma$  values 0.1, 0.01, and 0.001. Our selection of gamma is dependent on two factors, namely the Forget Set Accuracy (FA) and the Retain Set Accuracy (RA). A good unlearning algorithm should attain an FA of less than chance ( $\frac{1}{c}$  where  $c$  is the number of classes, in this case 10%). We first select all the  $\gamma$  values that result in an FA  $\leq 10$ . We then pick the  $\gamma$  that maximizes RA among those selected values. The results of the hyperparameter search are presented in Table C.5. We find that the burn-in of 100 is sufficient across datasets and we adopt it as standard in all our experiments.

Dataset	FA			RA		
	0.1	0.01	0.001	0.1	0.01	0.001
Permuted-MNIST	<b>10.412</b>	10.417	17.907	96.524	96.544	<b>96.602</b>
CIFAR-100	<b>8.000</b>	10.830	17.190	70.950	71.817	<b>72.173</b>
5-Datasets	8.278	<b>8.070</b>	9.783	<b>92.868</b>	92.779	92.847
Tiny-ImageNet	10.000	10.000	10.000	45.590	<b>48.625</b>	48.623

Table C.5: Table depicting the FA and RA for various gamma values across datasets.

The chosen  $\gamma$  values are 1e-1 for 5-Datasets and 1e-2 elsewhere.

## D EXPERIMENTAL DETAILS

### D.1 OPERATION SEQUENCES

On each dataset, we perform experiments over three unique sequences of learning and unlearning requests generated through random seeds. Experiments on the Five Datasets benchmark are performed over sequences of 7 requests. For Permuted-MNIST and CIFAR-100 datasets, we utilize sequences of 15 requests, and for the Tiny-ImageNet dataset, we experiment with long 30-request sequences. The sequences used are presented in Table D.6.

Datasets	Seq Nos	Sequences
<b>5-Datasets (7 requests)</b>	<b>1</b>	L0 → L1 → U0 → L2 → L3 → L4 → U1
	<b>2</b>	L3 → L4 → L2 → L0 → L1 → U3 → U0
	<b>3</b>	L0 → L2 → U0 → L4 → L3 → U2 → U4
<b>Permuted-MNIST &amp; CIFAR-100 (15 requests)</b>	<b>1</b>	L1 → L0 → U1 → L5 → L8 → L9 → L7 → U0 → L2 → L3 → L4 → U8 → U3 → U5 → L6
	<b>2</b>	L6 → L7 → L2 → L1 → L0 → U1 → L9 → U7 → U2 → U0 → L4 → U4 → L8 → U6 → L5
	<b>3</b>	L7 → L1 → L2 → L8 → L0 → U1 → L3 → L6 → U3 → U2 → L4 → L5 → U8 → L9 → U7
<b>Tiny-ImageNet (30 requests)</b>	<b>1</b>	L3 → L0 → U3 → L9 → L5 → L17 → L1 → L7 → L14 → L15 → L19 → U17 → U7 → → L6 → U15 → U9 → L12 → L4 → U5 → U4 → U6 → U0 → U1 → U14 → U12 → → L13 → L18 → L2 → L11 → L8
	<b>2</b>	L12 → L13 → L5 → L8 → L2 → U8 → L14 → U13 → U5 → U2 → L3 → U3 → L16 → → U12 → L11 → U16 → L7 → L15 → L10 → L19 → L9 → U14 → U7 → L18 → L6 → → L1 → L0 → L4 → U6 → L17
	<b>3</b>	L2 → L7 → U2 → L18 → L12 → U7 → U18 → L16 → L0 → U16 → U0 → L13 → L4 → → U12 → U13 → L9 → L19 → U19 → U4 → L10 → L14 → L5 → U5 → U10 → L11 → → L1 → U1 → L17 → L6 → L3

Table D.6: This table provides three different sequences that are used to understand the generalizability of our approach. Here,  $L\#n$  implies ‘learn task  $n$ ’ and  $U\#n$  implies ‘unlearn task  $n$ ’. Also for different task we have different sequence length showing that our method can scale to longer sequences.

## D.2 BASELINES: ADDENDUM

Methods that use DER++ as the base CL method use a standard ResNet backbone architecture with independent heads for each task. As these are in a task incremental setting, we get task IDs during inference, which is used to choose the required head. For these methods, we used Adam Optimizer with a learning rate of 0.001. For different datasets, learning epochs were different. 5-Datasets were trained for 20 epochs, CIFAR100 was trained for 30 epochs, Permuted-MNIST was trained for 10 epochs, and Tiny-ImageNet was trained for 30 epochs.

Methods that use Hypernetwork generate weights for the main network, which is a ResNet. In these cases the learning hyperparameters were the same as UnCLe.

**CLPU** Liu et al. (2022) is a method that perform exact unlearning. It requires apriori knowledge about which task has a possibility to be unlearned and which task will never be unlearned. Based on this information, the task that can be unlearned in the future is used to train an independent network. When they receive a request to unlearn a particular task, they just drop that network. In our CLU setup, no such assumption was made about the prior information, so we assume every task can get an unlearning request in the future. So, the direct implementation would be having independent networks for each task and throwing the network when an unlearning request is received. So, it is apparent that we will get a Forget set Accuracy of zero and an Unlearning Time of zero. Also, as the network is unavailable to us, we will not be able to calculate the divergence with uniform distribution.

**LWSF** Shibata et al. (2021b) introduces a new setup of learning with selective forgetting where, at every request, we will receive a set of classes to learn and a set of classes to forget. An extreme case of their setup is ours, where at every request, we either receive to learn classes or to unlearn classes. They introduced an approach using class-specific mnemonic codes. We observed that when their approach was applied to an extreme case like ours, they failed to unlearn the task. Their approach primarily used the advantage of learning and unlearning together and leveraged the catastrophic forgetting behavior of neural networks. So, to get the full potential of their approach, we calculated all the unlearning metrics for an unlearning operation after the next learning request arrives. Note that there can be multiple unlearning requests simultaneously; in that case, after all the unlearning, when the next learning comes, we will calculate all the unlearning metrics after that. As a reason for this modification, we don’t compute unlearning time for this method as it won’t be a fair comparison. For this method, we used a batch size of 200 with SGD optimizer and momentum as 0.9. We used a learning rate of 0.1 for all the datasets. For LWSF, Permuted-MNIST was not converging during training, so we didn’t report results for this dataset.

**BadTeacher** Chundawat et al. (2023a) is a baseline that uses a random network as a teacher model for the forget set and uses KL-divergence to match the distribution of the forget class to that of a random model. For the retained set, it tries to reduce the cross entropy corresponding to the ground truth. For our CLU setup, we modified the algorithm where for the CL part, we use a DER++, experience reply-based method where the memory buffer is again used to get the retain and forget set. We performed a

**SalUn** Fan et al. (2024) targets specific model weights that are most influenced by the data to be removed (the data from forget set) rather than modifying the entire model. This selective adjustment helps the unlearned model retain high performance on the remaining data. It needs to generate the weight saliency map corresponding to the forget set, which it does based on gradients. Based on this approach, we designed a baseline with DER++ as the base CL algorithm. To set this in a CL setup, the weight saliency mask needs to be created every time we encounter an unlearning request.

**SCRUB** Kurmanji et al. (2023) is designed to selectively remove knowledge of specific data points from a pre-trained model while maintaining overall model performance on the remaining data. Unlearning Phase (Forgetting): A student model is trained to deviate from the predictions of a pre-trained teacher model on the data that must be forgotten (the "forget set"). This step ensures that the model forgets specific information tied to those data points. Retention Phase: While the student model unlearns the forget set, it is simultaneously trained to match the performance of the teacher model on the remaining dataset (the "retain set"). This ensures that the model retains its predictive power on data that does not need to be forgotten. Based on this approach, we designed a baseline with DER++ as the base CL algorithm.

**SSD** Foster et al. (2024b) SSD operates as a two-step, post hoc method that does not require re-training the model, making it computationally efficient and suitable for scenarios where training data might not be readily accessible. Parameter Selection phase: SSD uses the Fisher information matrix to identify parameters crucial to the data that need to be forgotten. Dampening phase: It dampens these parameters' effects proportionally to their importance, allowing the model to forget the targeted data while maintaining performance on the remaining data. Based on this approach we designed a baseline with base CL algorithm as DER++.

**GKT & GKT-Hnet**: These baselines are based on the paper Chundawat et al. (2023b) where a generator is used to generate samples that are then used to forget information from the main network. We designed two methods, one that uses DER++ as the base CL algorithm and the other that uses Hypernetwork as the base algorithm.

**JiT & JiT-Hnet**: These baselines are based on Foster et al. (2024a), which leverages Lipschitz continuity to perform unlearning in a zero-shot manner. This approach involves smoothing the output of the model with respect to perturbations of the input data targeted for deletion, which helps in forgetting the specific data points while maintaining the model's overall performance. We used two different variants of this method for our setup, where one (JiT) uses DER++ as the base CL algorithm, and the other (JiT-Hnet) uses Hypernetwork as the base CL algorithm. We tuned the hyperparameters for each of these and found not much difference was achieved. So we have the same hyperparameters as provided in Foster et al. (2024a).

**Others** Apart from all these baselines, we also used **FT** where when an unlearning request is encountered, the current model is fine-tuned on the whole retain set. This also uses DER++ as the base CL approach. **RT** is one of the baselines that retrain the whole network from scratch on the retrain set to perform unlearning. **Hnet** is a baseline that uses a hypernetwork as the CL algorithm and uses the implicit forgetting nature of the neural network to perform unlearning. It just removes the particular regularization for the forget task, so the unlearning will only be apparent once a new learning request is encountered. **RT-Hnet** is a baseline that uses Hypernetwork as the base CL algorithm, and whenever an unlearning request is encountered, it trains a new hypernetwork in a sequential fashion on the retrain set.

### D.3 METRICS: ADDENDUM

#### D.3.1 AVERAGE RETAIN SET ACCURACY

The Average Retain Set Accuracy (RA) measures *Unlearning Stability*, indicating undesirable spillover effects over the tasks to be retained. It is the mean of the accuracy of all the retained tasks measured at the end of the sequence.

#### D.3.2 AVERAGE FORGET SET ACCURACY

The Average Forget Set Accuracy (FA) is a measure of *Unlearning Completeness*. It is the mean of the accuracy of all the forget tasks, measured at the end of their respective unlearn operations. An ideal FA value should be close to  $(100/N_c)$  where  $N_c$  is the number of classes per task. All experiments performed with UnCLe entail tasks with 10 classes each, putting the ideal FA value at 10.

#### D.3.3 OUTPUT DIVERGENCE FROM UNIFORM DISTRIBUTION

This is simultaneously a measure of *Unlearning Completeness* and *Unlearning Detectability*. An ideal unlearning algorithm should be both complete and undetectable in its wake. This metric measures the Jensen-Shannon divergence between the output logit distribution and the uniform distribution. An exact unlearning algorithm would report a divergence score of zero.

#### D.3.4 MEMBERSHIP INFERENCE ATTACK

The Membership Inference Attack (MIA) metric is a critical tool in evaluating the effectiveness of machine unlearning methods. MIAs exploit the model’s behavior to infer whether a specific data point was included in its training set, raising concerns about privacy and data retention. In the context of machine unlearning, the MIA metric is employed to measure how effectively a model has “forgotten” the training data. The objective is for the model to behave indistinguishably on forgotten data and new, unseen data, indicating successful unlearning. To evaluate this, adversarial attacks are used, where an attacker attempts to infer the membership status of data samples targeted for removal.

If a MIA value is 50%, it generally indicates that the attack performs no better than random guessing. In this context, the attack’s ability to correctly determine whether a data point was part of the training set is equivalent to a coin flip, where the attacker has a 50% chance of correctly identifying membership or non-membership Tu et al. (2024). A 50% MIA value suggests that the model has successfully mitigated the attack, as the adversary cannot infer membership status with any meaningful accuracy.

Datasets	5-Datasets		Permuted-MNIST		CIFAR100		Tiny-ImageNet	
Methods	Mean	Std	Mean	Std	Mean	Std	Mean	Std
<b>FT*</b>	49.56	0.22	49.63	0.07	45.00	0.66	45.26	0.73
<b>RT*</b>	49.95	0.37	49.98	0.07	49.82	0.50	49.72	0.23
<b>BadTeacher</b>	50.03	0.16	50.04	0.11	53.06	0.82	52.54	0.33
<b>SCRUB</b>	50.25	0.21	49.99	0.01	<b>50.00</b>	0.00	<b>50.00</b>	0.00
<b>SalUn</b>	50.25	0.29	49.85	0.13	46.26	0.42	47.47	0.73
<b>JiT</b>	49.99	0.17	49.95	0.08	45.80	0.73	47.28	0.15
<b>GKT</b>	50.05	0.08	49.99	0.01	49.88	0.20	49.93	0.06
<b>SSD</b>	49.98	0.03	50.01	0.01	<b>50.00</b>	0.00	<b>50.00</b>	0.00
<b>RT-Hnet*</b>	49.75	0.06	49.90	0.04	50.28	0.39	50.05	0.22
<b>Jit-Hnet</b>	50.10	0.06	50.02	0.08	48.74	1.11	49.39	0.24
<b>GKT-Hnet</b>	49.99	0.19	49.98	0.22	50.12	0.11	50.10	0.05
<b>UnCLe</b>	<b>50.01</b>	0.09	<b>50.00</b>	0.02	<b>50.00</b>	0.00	<b>50.00</b>	0.00

Table D.7: That table compares the MIA performance of different baseline approaches against UnCLe. Here, we provide results on all 4 datasets on request sequence 1, averaged across 3 seeds.



Table D.7 presents MIA values, with mean and standard deviation (std) across various methods and datasets such as Permuted-MNIST, CIFAR100, and Tiny-ImageNet. The values, which are around 50%, suggest a general trend where models are largely resistant to MIA, indicating that attackers have difficulty distinguishing between data points in and out of the training set.

As our setup is a setup for task unlearning with task incremental continual learning, we use different heads for different tasks. When forgetting a particular task, the corresponding head is severely randomized by each of the methods. So when performing MIA, the representation corresponding to the forget head is already random for all the cases, providing indistinguishable representations leading to an equivalent performance in MIA for all the methods.

Apart from this, our approach, UnCLe, exhibits near-perfect resistance to MIA, consistently showing a mean MIA value of 50.00% across all datasets. This means that the attacker’s ability to infer whether a data point was part of the training set is equivalent to random guessing, signifying robust privacy protection.

## E OTHER EXPERIMENTS

### E.1 BASELINES: ALTERNATIVE UNLEARNING STRATEGIES

Methods	RA	FA	UNI	MIA	UT	RA	FA	UNI	MIA	UT
	5-Datasets					CIFAR-100				
Fixed Noise	83.04	10.94	-inf	50.07	18.74	21.79	10.36	-inf	49.97	25.76
Norm Reduce	94.31	26.11	52.44	51.19	<b>18.3</b>	<b>62.75</b>	34.42	41.27	44.13	<b>25.39</b>
Discard $e_f$	<b>94.52</b>	80.91	-214.0	50.25	0.00	60.21	20.70	11.21	46.88	0.00
<b>UnCLe</b>	94.12	<b>10.04</b>	<b>100.0</b>	<b>50.01</b>	33.28	62.65	<b>10.00</b>	<b>100.0</b>	<b>50.00</b>	41.70
	Permuted-MNIST					Tiny-ImageNet				
Fixed Noise	84.55	<b>9.870</b>	-inf	49.99	10.48	34.68	<b>9.440</b>	-inf	50.11	22.62
Norm Reduce	96.70	94.99	-49.56	49.10	<b>10.34</b>	55.11	36.61	0.80	42.65	<b>22.42</b>
Discard $e_f$	<b>96.87</b>	61.79	-64.54	49.11	0.00	<b>56.50</b>	15.54	6.88	48.44	0.00
<b>UnCLe</b>	<b>96.87</b>	10.00	<b>100.0</b>	<b>50.00</b>	13.16	55.24	10.00	<b>100.0</b>	<b>50.00</b>	29.63

Table E.8: Table exploring various noising strategies on each of the four datasets. Results are on Request Sequence 1. All the other unlearning hyperparameters ( $\gamma$ ,  $E_u$ ) are kept constant for these experiments.

We experiment with a variety of noising strategies and compare our approach to norm reduction and fixed noise perturbation. **Norm reduction** uses the unlearning objective from Equation 4. **Fixed noise perturbation** uses the objective  $\|\mathcal{H}(e_f; \phi) - z\|_2^2 + \gamma \cdot \mathcal{L}_{reg}$  where the noise  $z$  is fixed throughout all tasks. **Discard  $e_f$**  is the baseline in which to perform unlearning, remove the forget task embedding  $e_f$ , and replace them with random embedding. From the Table E.8, we conclude that Fixed noise perturbation hampers the retain-task accuracy. We also observe that the forget-task accuracy it achieves, while lower than UnCLe in some instances, is marginally detectable, whereas UnCLe’s output remains the closest to the uniform distribution. Norm reduction maintains good RA but exhibits poor unlearning. If further reduction in FA is attempted via increasing burn-in, it compromises the model’s stability and impacts RA, as noted in the methodology. We also observe that UnCLe, compared to all the other baselines, has the closest MIA value to 50, proving its superiority in data privacy.

### E.2 SATURATION ALLEVIATION

A CL model is said to be saturated when the amount of free parameters available is insufficient to accommodate a new task without incurring catastrophic forgetting of old tasks. In the field of Continual Learning, saturation is typically encountered when a large number of tasks are learned relative to the model’s size. Saturation is a prime motivation for dynamic architectures that can expand model capacity to accommodate a greater number of classes Yoon et al. (2018). However, dynamic architectures suffer from issues such as having a large memory footprint and little to no knowledge transfer.

A saturated model suffers from the stability-plasticity dilemma Kirkpatrick et al. (2017). Such a model loses all its plasticity owing to all its parameters being tasked with storing information pertaining to a large variety of tasks. Attempts to forcefully learn new tasks will compromise its stability, resulting in catastrophic forgetting of old tasks. In regularization-based CL, where the model capacity cannot be expanded, there is no existing solution that can enable the model to learn new tasks without compromising stability. In such situations, we hypothesize that unlearning can alleviate saturation by effectively removing old and obsolete tasks, thereby making way for new tasks.

The hypernetwork in UnCLe maintains separate task embeddings for each task. Each of these embeddings, when input into the hypernetwork, generates task-specific classifier models. The consistency of the generation as the model adds new tasks continually is preserved by a regularization term depicted in Figure 2. Whenever there is a new learning operation, the regularization term enforces that the output of the hypernetwork in its current state is similar to that of the hypernetwork before the current operation. To do this, a copy of the hypernetwork is made, and the copy’s parameters are frozen. Now, as a new operation is performed and the hypernetwork’s parameters change, the distillation-inspired regularization term makes sure that the hypernetwork’s output for past tasks’ embeddings remains consistent, thereby minimizing forgetting. As a task is unlearned, the hypernetwork is no longer regularized with respect to its embedding when it learns future tasks. As a result, this reduces the number of constraints on the hypernetwork, helping alleviate saturation and improving the learning of new tasks post-unlearning.

To empirically demonstrate this phenomenon, we perform a comparison between a model that only learns tasks and UnCLe, which both learns and unlearns tasks. We analyze the results in two ways. As presented in Algorithm E.8, we compare the performance of each task right after the learning operation. As we can observe, after every unlearning operation, there is a notable performance when the next task is learned compared to Only Learning. Furthermore, Figure E.9 compares the performance of the tasks that remain at the end of the sequence of operations. In both cases, we find that UnCLe consistently outperforms the baseline that only performs learning operations, demonstrating that unlearning old tasks help learn new tasks better.

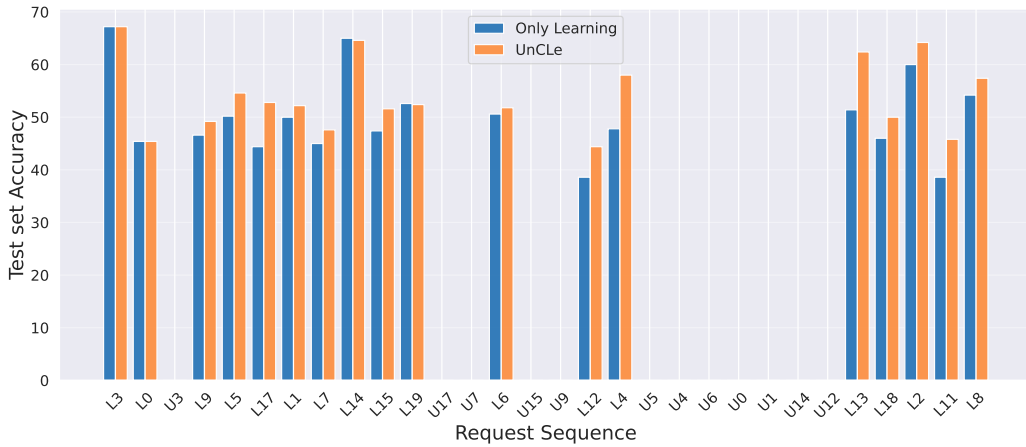


Figure E.8: A comparison between the individual task accuracies of UnCLe and a trivial baseline that only performs learning operations. Each of the above measurements are made immediately after the operation is performed. Note that tasks that follow unlearning operations consistently benefit from a higher accuracy. UnCLe outperforms the trivial baseline in every task that is retained.

### E.3 BURN-IN ANNEALING

We leverage the forward transfer observed in unlearning to enhance UnCLe’s efficiency by introducing an annealing strategy for the burn-in phase. With each unlearning operation, the burn-in rate is reduced by 10%, with a minimum of 20 iterations to ensure stability. This progressive reduction capitalizes on the model’s improved adaptability over time, significantly decreasing Unlearning

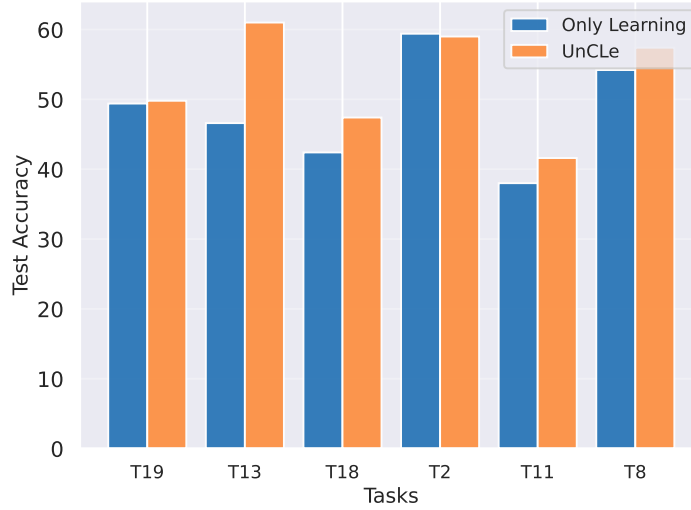


Figure E.9: A comparison between the final accuracies of the tasks that remain. UnCLe is compared with a trivial baseline that only performs learning operations. The measurements are made at the end of the sequence of operations.

Time (UT) without compromising performance. As shown in Table E.9, the Forget-Task Accuracy (FA) and Uniformity (UNI) metrics remain consistent, demonstrating that the annealing strategy maintains the quality of unlearning while optimizing computational efficiency.

Methods	FA	UNI	UT	FA	UNI	UT
	CIFAR-100			Tiny-ImageNet		
<b>without Annealing</b>	10.00	100.0	43.98	10.00	100.0	45.12
<b>with Annealing</b>	10.00	100.0	<b>41.70</b>	10.00	100.0	<b>29.63</b>

Table E.9: A comparison of UnCLe with and without Burn-In annealing.

#### E.4 STABILITY

Stability remains a significant challenge for existing unlearning frameworks, particularly in scenarios involving the continual learning and unlearning of tasks. Our experiments reveal critical shortcomings in baseline methods, which tend to destabilize models when tasked with balancing the dual demands of preserving knowledge for some tasks while unlearning others. We present the results of our experiments in Figure 4 in the main paper and in Figure E.10 and Figure E.11 in the appendix. The instability of existing unlearning methods in continual settings manifests in two ways:

##### E.4.1 FORGETTING RETAINED TASKS

Existing unlearning methods inadvertently cause catastrophic forgetting in tasks that are meant to be retained. This occurs because unlearning operations often modify shared model parameters, leading to unintentional degradation in the performance of previously learned tasks. Replay of data from previous tasks serves as the saving grace, helping salvage lost performance. However, this dependency on replay is not always practical, given that the lost performance will persist until a new learning operation follows. Even then, the lost performance almost never recovers fully.

We can observe this phenomenon in Figure E.10 and Figure E.11. In between the learning of the task and its eventual unlearning, we find that the task accuracy degrades whenever an unlearning operation is encountered only to rise back up when the next learning operation occurs. As mentioned, this is entirely due to replay, in the absence of which, the lost performance would remain lost. Various

baselines exhibit this instability in maintaining task accuracies to varying degrees whereas UnCLE stays close to the accuracy obtained right after the learning operation.

UnCLE, by contrast, is designed to maintain task stability firmly until a task is explicitly unlearned. This is achieved through the careful design of the hypernetwork and task-specific embeddings, which ensure that task representations remain untouched unless explicitly targeted for unlearning. This parameter isolation allows UnCLE to uphold the performance of retained tasks without requiring re-play, making it a more efficient and reliable solution for continual learning and unlearning scenarios.

#### E.4.2 REMEMBERING FORGOTTEN TASKS

A key expectation from any unlearning algorithm is that it must ensure unlearning is both thorough and permanent. Thoroughness implies that all knowledge related to the unlearned task is effectively erased from the model, leaving no residual influence on future operations. Permanence ensures that once a task is unlearned, its knowledge cannot be recovered when new tasks are introduced. Our findings highlight an alarming shortfall in existing unlearning methods: after unlearning a task, subsequent learning of new tasks can unintentionally restore the performance of the unlearned task to a level close to what it was before unlearning. As witnessed in Figure E.10 and Figure E.11, we find that the task accuracy jumps back up after unlearning when new tasks are learned. Various baselines exhibit this phenomenon to varying degrees whereas UnCLE stays close to the accuracy obtained right after the unlearning operation.

We believe that this occurs because existing methods often fail to completely eliminate the internal representations associated with the unlearned task. Instead, these representations may persist in latent forms within shared parameters or feature spaces, leading to unintended recovery when new tasks reinforce similar patterns. This troubling discovery raises serious concerns about the reliability and security of current unlearning frameworks, particularly in applications where permanent removal of knowledge is a regulatory or ethical necessity.

UnCLE directly addresses this issue by ensuring that unlearning is irreversible. Its hypernetwork-based architecture, coupled with a noise-alignment unlearning objective, thoroughly erases task-specific representations from the model. By aligning the outputs of the hypernetwork for unlearned tasks to noise, UnCLE effectively eliminates any trace of the unlearned task’s influence on model behavior. Unlike existing methods, UnCLE prevents recovery of unlearned tasks when new tasks are subsequently introduced, making it a more reliable framework for permanent unlearning.

The stark contrast between UnCLE and existing methods underscores the importance of designing unlearning algorithms that meet the dual requirements of stability and permanence. The shortcomings of existing methods, particularly their inability to guarantee permanence, demand further investigation. Future work should focus on:

1. Analyzing Residual Representations: Understanding why and how unlearned tasks persist in shared model spaces and developing techniques to eliminate such residual traces.
2. Defining Robust Metrics: Establishing rigorous benchmarks and metrics for evaluating the thoroughness and permanence of unlearning beyond task-specific accuracy.

UnCLE’s advancements in stability and permanence represent a significant step forward in continual learning and unlearning. By addressing critical challenges in a robust and efficient manner, it sets a strong foundation for the next generation of unlearning frameworks.

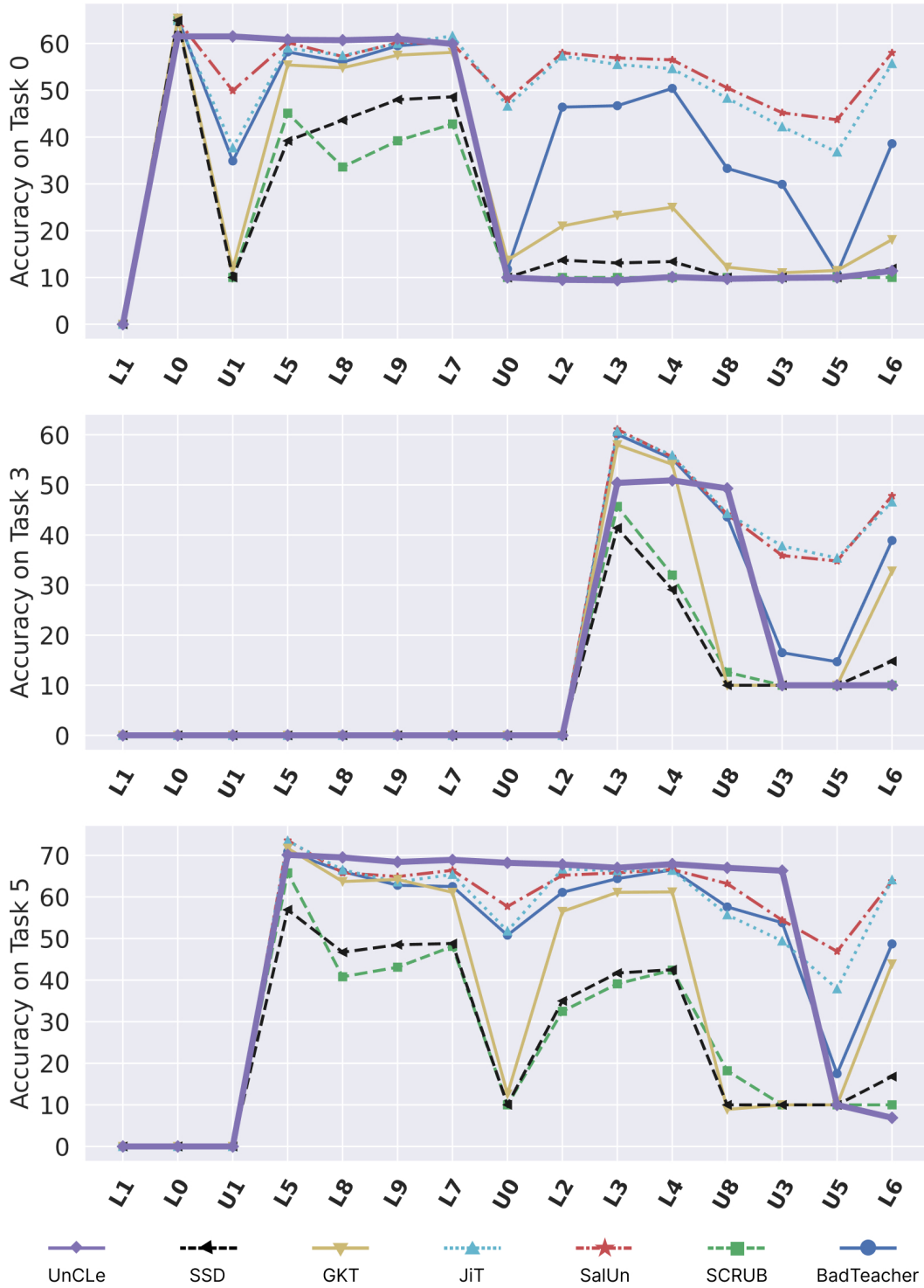


Figure E.10: Figure tracking task accuracies through the sequence of operations on the CIFAR 100 dataset. Each chart tracks a single task's accuracy as mentioned on the left.

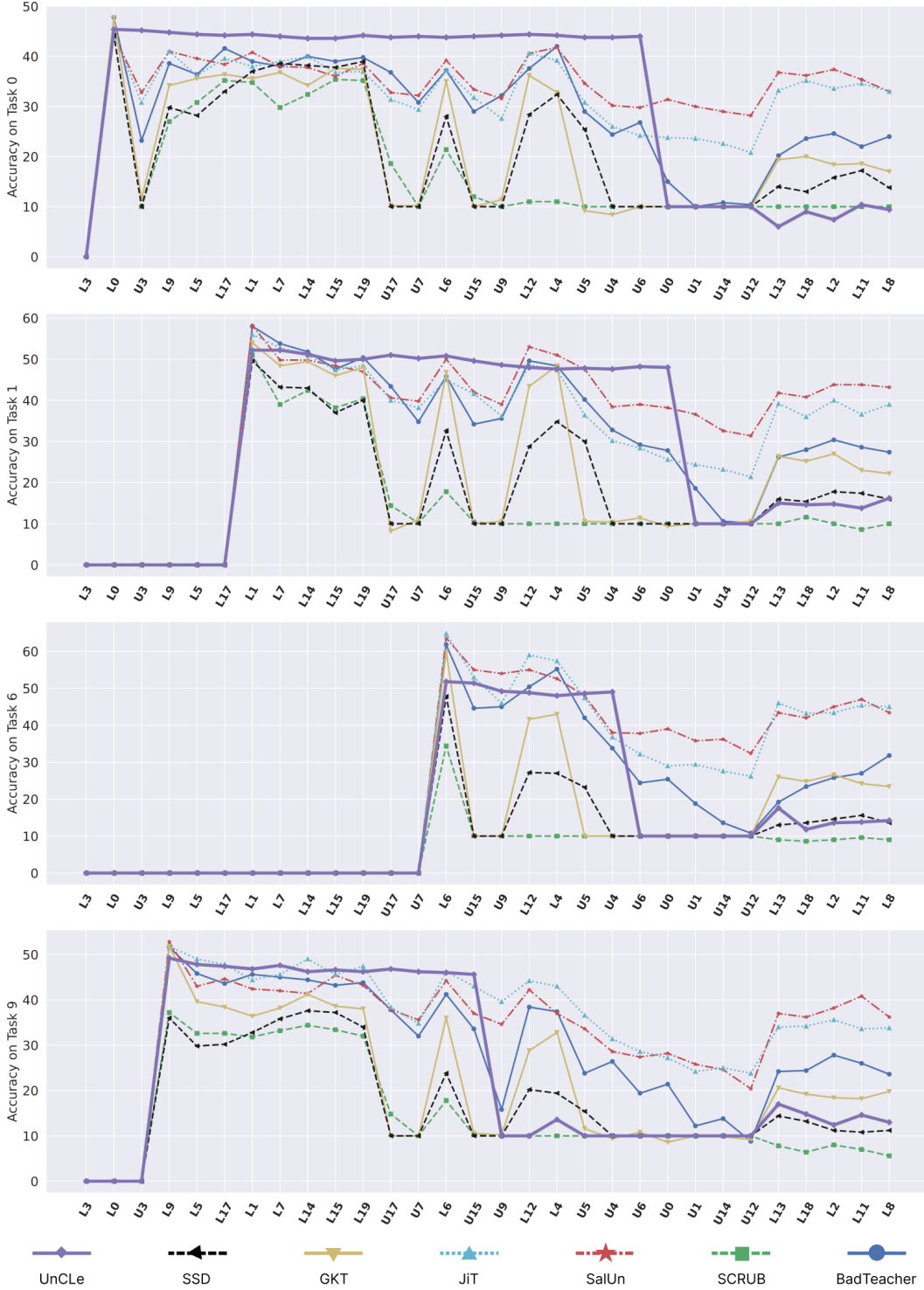


Figure E.11: Figure tracking task accuracies through the sequence of operations on the TinyImageNet dataset. Each chart tracks a single task's accuracy as mentioned on the left.

## E.5 PRIMARY EXPERIMENTS: ADDENDUM

## E.5.1 RESNET18 RESULTS

In this section, we present experiments with ResNet-18 as a backbone architecture. Each of these experiments is performed on Sequence 1 (Table D.6). The results are averaged over three runs with different seeds. We can observe from Table E.10, Table E.11, Table E.12, Table E.13, Table E.14 and Table E.15 that UnCLE performs better than all the other baselines on at least 3 out of 5 metrics. On the metric in which UnCLE is not the best, it performs equally well compared to the best one. These tables show UnCLE’s superiority over other unlearning baselines.

Methods	RA		FA		UNI		SBY		UT	
	mean	std	mean	std	mean	std	mean	std	mean	std
<b>BadTeacher</b>	62.87	8.07	9.650	0.65	99.96	0.02	89.24	2.64	51.45	7.76
<b>SCRUB</b>	10.90	2.44	9.340	0.58	-inf	-	75.64	1.33	111.7	10.6
<b>SalUn</b>	58.94	9.87	35.16	5.02	99.35	0.14	88.95	2.51	380.9	30.3
<b>JiT</b>	16.66	2.77	<b>8.990</b>	1.93	-31.09	42.4	76.87	1.12	235.8	56.6
<b>GKT</b>	10.82	1.25	15.21	1.68	96.37	0.76	75.35	0.42	37.39	6.02
<b>SSD</b>	30.22	22.5	15.07	6.14	99.99	0.01	79.74	5.22	38.46	3.9
<b>Jit-Hnet</b>	14.74	4.69	13.15	4.49	-inf	-	74.44	8.69	201.0	16.9
<b>GKT-Hnet</b>	10.07	0.71	10.69	1.4	83.19	1.36	77.10	0.43	42.92	2.27
<b>UnCLE</b>	<b>93.77</b>	0.40	9.600	0.99	<b>100.0</b>	0.00	<b>99.94</b>	0.04	<b>10.89</b>	0.02

Table E.10: Results on 5-Datasets (Sequence 1) with ResNet-18 Backbone

Methods	RA		FA		UNI		SBY		UT	
	mean	std	mean	std	mean	std	mean	std	mean	std
<b>BadTeacher</b>	65.13	3.67	10.11	0.52	99.55	0.01	88.58	0.4	6.65	3.29
<b>SCRUB</b>	53.39	3.15	<b>10.00</b>	0.00	-inf	-	74.73	0.26	18.00	4.14
<b>SalUn</b>	<b>69.29</b>	2.42	46.24	0.99	81.83	0.31	91.57	0.48	85.69	12.62
<b>JiT</b>	68.96	1.93	40.74	0.41	35.00	6.49	87.82	0.92	28.96	6.79
<b>GKT</b>	61.53	3.49	11.01	0.57	93.16	4.83	70.33	0.53	38.80	1.23
<b>SSD</b>	47.31	5.45	<b>10.00</b>	0.00	99.98	0.01	66.72	0.44	<b>4.440</b>	0.50
<b>Jit-Hnet</b>	51.52	18.8	21.84	4.71	64.49	14.22	88.21	4.52	20.50	1.59
<b>GKT-Hnet</b>	40.87	5.85	13.89	1.11	91.32	1.47	72.67	1.38	47.06	2.72
<b>UnCLE</b>	66.97	3.59	<b>10.00</b>	0.00	<b>100.0</b>	0.00	<b>99.33</b>	0.39	13.26	0.01

Table E.11: Results on CIFAR100 (Sequence 1) with ResNet-18 backbone

Methods	RA		FA		UNI		SBY		UT	
	mean	std	mean	std	mean	std	mean	std	mean	std
<b>BadTeacher</b>	53.76	1.63	12.12	0.52	99.47	0.02	85.96	0.12	6.310	1.28
<b>SCRUB</b>	11.71	1.90	<b>10.00</b>	0.00	-inf	-	70.45	1.35	17.31	1.09
<b>SalUn</b>	59.47	0.80	39.27	1.64	71.80	0.93	89.21	0.18	44.18	5.52
<b>JiT</b>	<b>59.88</b>	0.65	38.60	0.77	47.13	5.43	86.27	0.25	17.18	0.33
<b>GKT</b>	54.31	0.31	13.01	0.90	97.39	0.05	71.45	0.31	112.74	3.85
<b>SSD</b>	53.37	2.60	10.26	0.36	99.99	0.00	67.81	0.78	<b>4.530</b>	0.48
<b>Jit-Hnet</b>	59.20	1.77	16.32	0.23	89.57	2.54	87.32	1.85	15.37	0.70
<b>GKT-Hnet</b>	48.34	1.15	10.92	0.43	96.97	0.56	73.74	0.62	45.30	0.83
<b>UnCLE</b>	59.22	2.14	<b>10.00</b>	0.00	<b>100.0</b>	0.00	<b>98.58</b>	0.66	11.42	0.03

Table E.12: Results on Tiny-ImageNet (Sequence 1) with ResNet-18 backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
FT*	94.47	0.12	67.70	2.11	19.93	0.10	98.52	1.09	1139	57.8
RT*	93.35	0.19	10.38	1.53	99.20	0.09	98.26	1.33	1532	436
BadTeacher	92.17	0.04	10.20	0.40	99.95	0.01	83.87	13.1	55.50	35.4
SCRUB	9.97	0.46	<b>9.84</b>	0.14	-inf	-	87.93	32.3	118.9	50.6
SalUn	92.39	0.26	59.24	2.74	98.47	0.07	93.53	4.18	358.3	51.6
JiT	86.93	6.09	29.90	4.96	-3.76	112	84.52	13.3	213.7	44.3
GKT	89.77	0.31	12.13	0.95	96.64	1.32	72.46	18.1	36.08	0.07
SSD	86.32	0.40	9.93	0.13	99.66	0.13	71.88	18.5	35.16	14.9
CLPU	91.73	0.22	<b>0.00</b>	0.00	-	-	97.22	1.55	<b>0.00</b>	0.00
RT-Hnet*	70.78	1.71	14.08	0.54	-30.27	7.54	78.04	22.6	1149	54.23
Hnet	96.60	0.16	96.91	0.09	-405.1	19.1	83.59	15.4	-	-
Jit-Hnet	76.81	14.1	10.27	0.94	89.58	9.28	76.51	17.6	257.5	20.9
GKT-Hnet	95.34	0.37	14.46	0.35	91.03	0.55	75.01	17.6	43.77	0.34
UnCLE	<b>96.87</b>	0.20	10.00	0.06	<b>100.0</b>	0.00	<b>99.99</b>	0.01	<b>13.16</b>	0.05

Table E.13: Results on Permuted-MNIST (Sequence 1) with ResNet-18 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
FT*	95.12	0.68	70.51	1.29	3.29	1.78	99.01	0.13	776.66	43.88
RT*	95.19	0.41	10.22	0.68	99.17	0.02	98.56	0.20	939.12	219.29
BadTeacher	94.88	0.30	9.94	0.54	99.96	0.00	90.78	1.97	50.52	27.79
SCRUB	10.06	0.07	<b>9.81</b>	0.31	-inf	-	73.16	0.36	112.72	40.27
SalUn	95.30	0.11	56.92	0.87	98.83	0.05	94.53	0.40	448.90	168.07
JiT	36.59	47.23	19.70	3.11	66.60	7.48	79.06	1.43	191.15	30.01
GKT	92.35	0.25	10.70	0.82	97.01	1.00	74.72	0.24	34.68	0.05
SSD	89.75	0.74	9.84	0.16	99.94	0.01	74.22	0.11	34.11	13.12
CLPU	95.21	0.29	<b>0.00</b>	0.00	-	-	97.72	0.16	<b>0.00</b>	0.00
RT-Hnet*	82.94	14.33	14.02	0.55	-35.60	21.74	84.17	2.56	1045	45.6
Hnet	96.67	0.29	96.71	0.12	-280.94	27.89	89.53	0.01	-	-
Jit-Hnet	94.15	2.19	10.55	0.54	92.11	7.14	78.65	2.32	220.32	44.34
GKT-Hnet	96.31	0.09	13.84	0.33	90.92	0.47	76.66	0.30	41.94	0.38
UnCLE	<b>97.00</b>	0.15	9.84	0.16	<b>100.00</b>	0.00	<b>99.97</b>	0.02	<b>11.01</b>	0.02

Table E.14: Results on Permuted-MNIST (Sequence 2) with ResNet-18 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
FT*	94.22	0.10	65.17	1.93	21.65	1.19	98.40	0.06	1297	82.42
RT*	93.49	0.06	10.62	1.01	99.46	0.06	97.93	0.12	1505	412
BadTeacher	79.56	4.29	10.28	0.81	99.94	0.02	90.96	0.46	49.34	15.3
SCRUB	9.97	0.08	9.98	0.25	-inf	-	62.45	4.39	118.0	47.2
SalUn	82.40	0.89	64.78	2.31	98.30	0.13	93.50	0.11	488.8	203
JiT	34.45	42.3	31.00	11.7	71.94	11.4	79.05	10.5	189.0	36.0
GKT	12.80	2.35	11.43	0.72	96.37	1.44	68.62	0.19	36.70	0.07
SSD	9.90	0.32	9.92	0.45	99.99	0.00	67.81	0.13	36.81	9.92
CLPU	91.72	0.16	<b>0.00</b>	0.00	-	-	96.97	0.10	<b>0.00</b>	0.00
RT-Hnet*	49.57	8.69	16.15	0.74	5.80	8.45	69.49	2.50	1635	97.2
Hnet	96.80	0.08	96.72	0.11	-345.1	29.9	94.59	0.02	-	-
Jit-Hnet	9.41	0.43	<b>9.73</b>	0.63	-inf	-	69.83	3.45	182.3	40.9
GKT-Hnet	13.96	2.53	17.25	2.26	89.65	0.91	71.46	0.35	44.55	0.40
UnCLE	<b>96.98</b>	0.23	9.93	0.19	<b>100.0</b>	0.00	<b>99.99</b>	0.00	<b>14.79</b>	0.22

Table E.15: Results on Permuted-MNIST (Sequence 3) with ResNet-18 Backbone



## E.5.2 RESNET50 RESULTS

The results from the primary results table, Table 1 are obtained from Sequence 1, averaged over three runs with different seeds. This section hosts the results from all three sequences, reported with mean and standard deviation obtained from averaging each experiment performed over three different seeds. The section is organized as a list of tables, with one table for each dataset-sequence pair, in the order of 5-Datasets, CIFAR-100, and Tiny-ImageNet.

Methods	RA		FA		UNI		SBY		UT	
	mean	std	mean	std	mean	std	mean	std	mean	std
<b>FT*</b>	88.66	0.45	67.99	2.83	23.85	1.66	97.58	0.15	1595	22.3
<b>RT*</b>	84.79	1.88	9.600	4.22	99.76	0.03	96.58	0.36	1566	19.5
<b>BadTeacher</b>	54.38	23.5	<b>8.550</b>	1.23	99.99	0.0	86.14	6.71	76.78	16.3
<b>SCRUB</b>	9.160	0.15	12.97	0.08	-inf	-	77.55	10.1	171.1	5.81
<b>SalUn</b>	74.75	1.56	25.02	1.22	99.19	0.02	93.80	0.27	491.9	8.01
<b>JiT</b>	19.10	13.8	17.20	3.55	-inf	-	87.09	14.8	242.1	31.4
<b>GKT</b>	10.27	0.91	13.67	1.52	94.58	2.10	75.24	0.22	57.67	5.98
<b>SSD</b>	8.850	0.00	10.36	0.09	99.79	0.05	72.83	0.40	47.12	0.45
<b>LWSF+</b>	31.76	0.25	<b>0.00</b>	0.00	99.98	0.01	51.21	1.05	-	-
<b>CLPU</b>	85.00	0.43	<b>0.00</b>	0.00	-	-	96.50	0.15	<b>0.00</b>	0.00
<b>RT-Hnet*</b>	76.23	3.31	18.44	0.78	-108.5	71.04	95.63	0.48	1896	1.25
<b>Hnet+</b>	94.56	0.28	96.73	0.04	-381.0	63.54	<b>99.99</b>	0.07	-	-
<b>Jit-Hnet</b>	10.19	1.18	11.29	4.37	-inf	-	73.65	6.20	306.6	5.08
<b>GKT-Hnet</b>	10.53	0.61	14.48	1.00	88.66	0.77	77.19	0.11	83.30	1.37
<b>UnCLe</b>	<b>94.12</b>	0.43	10.04	1.14	<b>100.0</b>	0.0	99.91	0.16	<b>33.28</b>	11.7

Table E.16: Results on 5-Datasets (Sequence 1) with ResNet-50 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
<b>FT*</b>	88.54	0.53	58.07	2.4	42.12	5.03	95.62	0.13	3920	79.7
<b>RT*</b>	86.14	3.72	9.410	0.59	99.80	0.07	94.85	0.60	3851	68.5
<b>BadTeacher</b>	40.01	3.01	8.270	0.37	99.94	0.03	85.25	1.09	69.38	27.5
<b>SCRUB</b>	9.90	0.24	12.80	2.63	-inf	0	66.65	0.32	119.6	1.45
<b>SalUn</b>	56.29	7.81	29.40	2.71	93.56	1.01	87.62	1.72	357.5	4.25
<b>JiT</b>	11.66	3.51	22.31	6.3	19.88	14.3	77.09	2.48	170.3	33.6
<b>GKT</b>	10.52	0.22	14.44	0.88	97.24	0.84	66.98	0.26	66.48	11.3
<b>SSD</b>	10.10	0.01	14.59	4.66	100.0	0.0	66.54	0.68	<b>33.24</b>	0.19
<b>CLPU</b>	83.18	1.62	<b>0.0</b>	0.0	-	-	93.94	0.37	0.0	0.0
<b>RT-Hnet*</b>	62.78	6.57	10.55	1.01	-75.78	17.3	85.05	0.04	3956	15.1
<b>Hnet+</b>	<b>96.39</b>	0.07	93.84	0.24	-524.8	50.6	<b>99.97</b>	0.07	-	-
<b>Jit-Hnet</b>	9.770	0.23	17.18	8.8	75.77	5.97	83.46	4.39	202.2	5.89
<b>GKT-Hnet</b>	9.010	1.14	<b>9.370</b>	0.69	90.22	1.46	68.62	0.32	87.28	1.08
<b>UnCLe</b>	95.91	0.07	9.930	3.23	<b>100.0</b>	0.0	99.83	0.07	36.12	0.18

Table E.17: Results on 5-Datasets (Sequence 2) with ResNet-50 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
FT*	91.21	0.45	58.63	0.59	6.520	2.24	97.75	0.38	568.0	15.08
RT*	91.87	0.66	<b>7.86</b>	1.81	99.56	0.06	95.31	0.42	551.8	7.12
BadTeacher	39.07	25.2	10.20	0.96	99.99	0.00	79.02	2.58	74.15	11.56
SCRUB	9.22	2.39	10.22	0.55	-inf	-	85.90	7.73	165.9	3.08
SalUn	37.55	6.75	21.99	1.96	99.22	0.07	86.75	0.22	468.0	6.16
JiT	12.56	7.53	11.77	1.43	-55.48	57.9	73.85	2.30	225.5	14.94
GKT	8.35	0.88	13.03	1.25	96.71	0.25	67.29	0.47	50.69	0.39
SSD	12.42	7.55	10.22	0.55	99.51	0.78	73.44	11.7	46.09	1.24
CLPU	89.54	0.79	0.00	0.00	-	-	95.30	0.25	0.00	0.00
RT-Hnet*	<b>94.05</b>	0.13	9.350	0.48	-119.1	68.6	95.89	1.84	597.2	12.5
Hnet <sup>+</sup>	92.96	0.13	93.26	0.08	-442.1	40.1	<b>99.95</b>	0.05	-	-
Jit-Hnet	7.12	0.66	11.40	2.95	-62.05	114	72.39	0.57	289.8	4.23
GKT-Hnet	15.11	4.94	13.74	0.90	91.83	2.07	72.32	0.64	76.71	1.85
UnCLE	93.24	0.76	11.40	3.05	<b>100.0</b>	0.00	99.93	0.07	<b>19.50</b>	0.00

Table E.18: Results on 5-Datasets (Sequence 3) with ResNet-50 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
FT*	<b>72.43</b>	3.46	55.44	4.16	10.50	9.08	96.60	3.45	719.6	130
RT*	62.91	3.62	<b>9.69</b>	1.17	99.19	0.10	92.45	4.12	577.4	112
BadTeacher	61.75	4.47	14.57	0.60	99.63	0.01	86.13	6.99	10.95	2.23
SCRUB	29.45	7.18	10.06	0.10	-inf	-	64.85	18.9	30.02	6.96
SalUn	66.56	3.58	44.89	2.14	59.85	3.05	89.32	5.09	51.47	0.10
JiT	65.94	3.58	43.93	2.48	22.11	3.84	87.31	5.97	24.01	5.60
GKT	57.05	3.15	10.70	0.44	95.97	0.18	70.23	17.5	68.61	7.72
SSD	43.27	4.25	10.00	0.00	99.97	0.01	65.95	18.6	<b>5.73</b>	0.31
CLPU	63.10	3.77	<b>0.00</b>	0.00	-	-	91.44	3.93	<b>0.00</b>	0.00
RT-Hnet*	23.81	0.89	9.71	1.37	-1.24	27.73	63.53	25.5	845.2	12.5
Hnet	60.52	3.73	62.84	2.72	-85.50	25.34	82.74	15.0	-	-
Jit-Hnet	60.79	4.45	16.97	3.49	74.97	7.58	85.20	12.3	22.94	1.87
GKT-Hnet	40.22	7.49	9.97	0.83	90.98	1.43	73.62	17.9	83.46	9.58
UnCLE	62.65	3.85	10	0.00	<b>100.0</b>	0	<b>99.19</b>	0.42	41.70	4.25

Table E.19: Results on CIFAR-100 (Sequence 1) with ResNet-50 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
FT*	<b>73.45</b>	3.47	57.81	1.24	9.05	3.15	97.52	0.17	387.2	95.2
RT*	67.42	2.41	<b>9.84</b>	1.60	99.14	0.20	94.03	0.58	399.5	61.1
BadTeacher	66.67	3.58	12.97	1.37	99.73	0.02	85.80	1.13	7.22	0.36
SCRUB	13.13	4.09	10.00	0.00	-inf	-	69.12	0.97	24.66	1.04
SalUn	72.33	3.00	44.16	2.21	53.45	1.56	90.13	0.53	46.60	0.32
JiT	71.80	3.38	45.98	0.26	14.26	3.93	89.21	0.72	20.15	1.03
GKT	61.00	2.27	11.82	0.85	95.43	0.64	72.47	0.22	61.26	4.15
SSD	46.45	1.43	10.00	0.00	99.56	0.36	70.55	0.61	5.38	0.48
CLPU	69.83	1.85	<b>0.00</b>	0.00	-	-	92.47	0.36	0.00	0.00
RT-Hnet*	44.32	6.60	10.06	1.06	-9.17	10.1	72.37	2.86	412.5	30.8
Hnet	66.08	2.07	62.59	1.37	-66.95	16.9	88.48	0.87	-	-
Jit-Hnet	66.97	2.81	20.24	2.34	84.11	3.51	90.76	4.88	24.10	6.61
GKT-Hnet	58.58	5.98	11.36	0.29	91.41	0.88	77.35	0.83	86.52	8.85
UnCLE	66.82	2.85	10.00	0.00	<b>100.0</b>	0.00	<b>99.4</b>	0.55	<b>29.52</b>	0.65

Table E.20: Results on CIFAR-100 (Sequence 2) with ResNet-50 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
<b>FT*</b>	<b>72.01</b>	2.19	58.79	3.25	5.55	6.56	96.88	1.24	659.3	181
<b>RT*</b>	62.47	2.65	9.79	1.34	99.25	0.12	92.21	0.82	618.1	93.11
<b>BadTeacher</b>	52.76	1.51	14.55	1.58	99.56	0.02	86.65	0.69	11.47	1.99
<b>SCRUB</b>	10.00	0.00	10.00	0.00	-inf	-	61.99	0.78	32.53	2.85
<b>SalUn</b>	57.92	2.15	48.07	1.99	57.57	1.80	89.00	1.30	53.57	0.38
<b>JiT</b>	55.19	5.52	46.77	2.28	26.37	4.19	87.20	1.34	20.17	1.87
<b>GKT</b>	11.91	1.38	12.67	1.30	91.88	2.51	65.83	0.33	68.73	5.49
<b>SSD</b>	10.00	0.00	10.36	0.62	99.94	0.01	62.46	2.16	<b>6.17</b>	1.12
<b>CLPU</b>	61.23	2.56	<b>0.00</b>	0.00	-	-	90.31	1.71	<b>0.00</b>	0.00
<b>RT-Hnet*</b>	15.42	1.75	<b>9.60</b>	0.45	10.93	15.81	58.79	0.99	789.4	52.4
<b>Hnet</b>	60.66	2.37	62.04	0.35	-131.33	25.54	92.77	0.89	-	-
<b>Jit-Hnet</b>	28.17	7.95	17.87	0.69	83.00	2.84	82.35	3.45	24.09	3.35
<b>GKT-Hnet</b>	9.54	0.94	11.44	1.49	89.80	4.72	67.90	0.34	93.04	2.41
<b>UnCLe</b>	58.15	6.09	10.00	0.00	<b>100.00</b>	0.00	<b>98.85</b>	0.74	41.12	0.59

Table E.21: Results on CIFAR-100 (Sequence 3) with ResNet-50 Backbone

Methods	RA		FA		UNI		SBY		UT	
	Mean	Std	Mean	std	Mean	std	mean	std	mean	std
<b>FT*</b>	<b>60.08</b>	0.30	52.56	2.38	-11.47	6.08	95.55	0.30	694.2	28.6
<b>RT*</b>	51.86	0.16	10.47	0.59	99.23	0.07	90.74	0.82	693.2	27.8
<b>BadTeacher</b>	52.79	1.40	15.73	1.09	99.55	0.00	83.76	0.36	8.68	0.32
<b>SCRUB</b>	19.48	15.4	10.00	0.00	-inf	-	71.13	0.79	32.52	2.72
<b>SalUn</b>	58.44	1.57	36.02	1.23	65.02	0.70	86.94	1.14	65.2	2.15
<b>JiT</b>	57.86	2.13	32.70	0.48	21.10	4.79	84.42	0.42	17.71	0.95
<b>GKT</b>	52.44	1.53	11.35	0.77	97.16	0.75	70.90	0.54	147.6	72.8
<b>SSD</b>	39.78	3.43	10.37	0.62	99.98	0.01	69.70	1.83	<b>5.81</b>	0.32
<b>CLPU</b>	54.90	1.27	<b>0.00</b>	0.00	-	-	89.54	0.85	<b>0.00</b>	0.00
<b>RT-Hnet*</b>	53.54	2.76	<b>9.74</b>	0.86	-23.62	12.3	73.55	0.40	758.0	56.0
<b>Hnet</b>	57.53	2.26	54.31	3.35	-72.66	4.57	76.06	0.43	0.00	0.00
<b>Jit-Hnet</b>	54.10	2.39	13.05	0.35	91.07	1.65	81.61	0.28	22.83	3.73
<b>GKT-Hnet</b>	44.40	2.26	9.85	0.30	94.43	1.51	73.61	0.51	75.75	0.05
<b>UnCLe</b>	55.24	3.66	10.00	0.00	<b>100.0</b>	0.00	<b>98.19</b>	0.73	29.63	0.29

Table E.22: Results on Tiny-ImageNet (Sequence 1) with ResNet-50 Backbone

## F COMPARISON OF REQUEST SEQUENCES

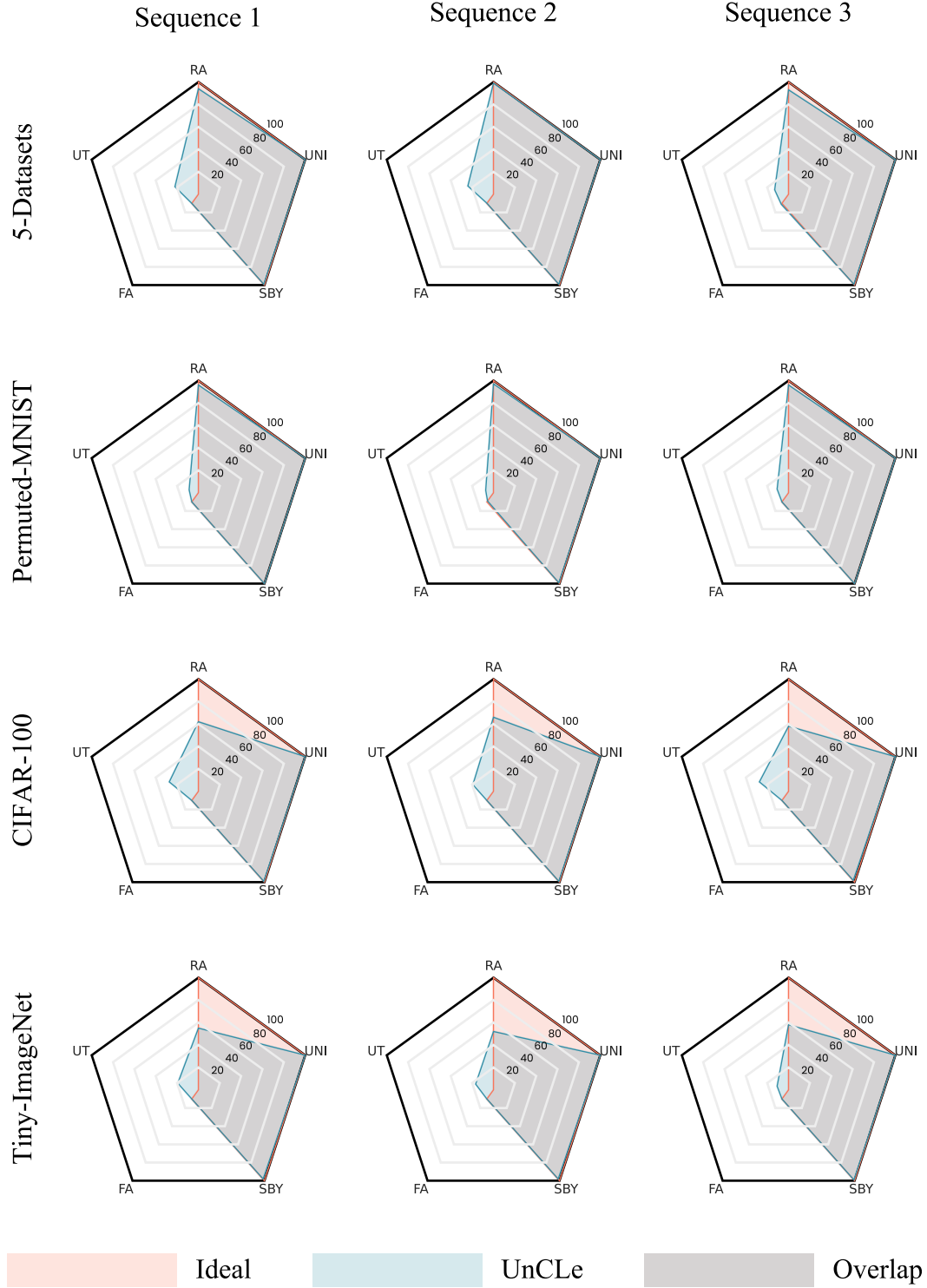


Figure F.12: A collage of radar plots displaying UnCLE’s performance over different request sequences and datasets. The sequences are presented in Table D.6. This shows that UnCLE’s performance is agnostic to sequences.