	Claim Language	Accused Instrumentalities: Computer equipment configured with or utilizing software based on an Accused Version of Linux	Specificity Objections
1.	An information storage and retrieval system, the system comprising:	Bedrock Computer Technologies LLC ("Bedrock") does not express a position at this time as to whether the preamble of this claim limits the claim's scope. Nevertheless, Bedrock identifies below aspects of the Accused Instrumentalities that correspond to the claim preamble. When Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) computer equipment configured with or utilizing software based on Linux version 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x, 2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x, 2.6.12.x, 2.6.13.x, 2.6.14.x, 2.6.15.x, 2.6.16.x, 2.6.17.x, 2.6.18.x, 2.6.19.x, 2.6.20.x, 2.6.21.x, 2.6.22.x, 2.6.23.x, 2.6.24.x, 2.6.25.x, 2.6.26.x, 2.6.27.x, 2.6.28.x, 2.6.29.x, 2.6.30.x, or 2.6.31 (each of which, individually, is an "Accused Version of Linux"), Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) a system that is especially adapted for information storage and retrieval. In the event this preamble is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this preamble and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially	Bedrock fails to provide separate infringement contentions for each accused version of Linux. The route.c code differs from version to version, with some substantial changes being incorporated into the file over the six year span between the first and latest versions. For example, the functions ip_mkroute_input and ip_mkroute_output, both of which Bedrock points to as accused instrumentalities, do not exist in Linux versions 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x, 2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x. Moreover, because of Bedrock's failure to specify which lines of code it contends infringes, Defendants cannot determine whether changes in the files affect the infringement contentions. Defendants ask the Court to require Bedrock to produce separate infringement contentions for each version of Linux that take into account the differences in the code from version to version.

[1] For the sake of brevity, only three claims are included here as examples. These examples of Bedrock's lack of specificity apply equally to claims 3, 4, 5, 6, and 8.

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		the same result, as the recited limitation.	
a.[2]	a linked list to store and provide access to records stored in a memory of the system, at least some of the records automatically expiring,	When Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) a system that is especially adapted to include a linked list to store and provide access to records stored in a memory of the system, at least some of the records automatically expiring. Within each and every Accused Version of Linux, data structure rt_hash_table in module /net/ipv4/route.c[3] anchors one or more linked list(s) to store and provide access to records stored in a memory of the system, at least some of the records automatically expiring. In this way, computer equipment configured with or utilizing software based on an Accused Version of Linux includes a linked list to store and provide access to records stored in a memory of the system, at least some of the records automatically expiring. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would	Bedrock fails to specify where in route.c it contends that the "linked list(s) . . . store and provide access to records" and where the records in the linked list "automatically expire." Though it points to rt_hash_table as a structure that "anchors one or more linked list(s)," that structure is referenced 28 times in the latest accused version of the code[4], and items pointed to by that structure are referred to hundreds of times (usually as the variable rth or rthp). Moreover, the code is over 3,500 lines in length. Simply pointing to rt_hash_table does not explain where or how Bedrock contends that the records in the linked lists anchored by that structure "automatically expire." Defendants ask the Court to require Bedrock to point to which lines of code it contends satisfy the requirements of this element of the patent claim.

[2] While the limitations are not lettered in the actual claims of the patent, Bedrock provides them here for ease of reference.

[3] The path names of the cited source code is provided for the defendants' convenience. If any version or customization of any Accused Version of Linux deviates from the path names that are cited in these charts, such deviations are insignificant because it is the routines, functions, methods, macros, classes, data structures, etc., as embodied on servers and other devices, that infringe.

[4] Defendants' objections to the contentions will use the latest accused version of the route.c code, 2.6.31, to illustrate why the contentions are not specific enough. The other versions of the accused code differ from this example, some in rather substantial ways. The fact that Bedrock only provided one chart for all these versions underscores its failure to adequately disclose its infringement contentions.

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		be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	
b.	a record search means utilizing a search key to access the linked list,	When Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) a system that is especially adapted to include a record search means utilizing a search key to access the linked list or its equivalent. Specifically, code contained within functions ip_route_input_mc, ip_mkroute_input, ip_route_input_slow, ip_mkroute_output, ip_rt_redirect, and/or ip_route_output_slow in module /net/ipv4/route.c calls functions rt_hash and rt_intern_hash. In this way, computer equipment configured with or utilizing software based on an Accused Version of Linux includes a record search means utilizing a search key to access the linked list or its equivalent. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	Bedrock fails to explain what code in the listed functions it contends are the "record search means" and what it contends is the "search key." Though it points to rt_hash and rt_intern_hash, it does not state which function it contends corresponds with which element, nor does it state whether it contends that any other code within the functions satisfy this requirement. Moreover, the functions ip_mkroute_input and ip_mkroute_output do not exist in Linux versions 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x, 2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x. Defendants ask the Court to require that Bedrock point to which lines in the publicly available code Bedrock contends satisfy the requirements of this element of the claim.
c.	the record search means including a means for	When Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) computer equipment configured with or utilizing software based on an Accused	Bedrock fails to explain where within rt_intern_hash it contends that the means exist for identifying and removing at least some of the

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	identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed, and	Version of Linux, Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) a system that is especially adapted to include a record search means, the record search means including a means for identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed or its equivalent. Specifically, code contained within function rt_intern_hash, as invoked by functions ip_route_input_mc, ip_mkroute_input, ip_route_input_slow, ip_mkroute_output, ip_rt_redirect, and/or ip_route_output_slow in module /net/ipv4/route.c, comprises record search means including a means for identifying and removing at least some of the expired ones of the records from the linked list when the linked list is accessed or its equivalent. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	expired ones of the records from the linked list when the linked list is accessed. The function rt_intern_hash contains 186 lines of code. Within those lines of code, the function makes calls to at least 20 other functions, some of which are not defined in the route.c file. Each of those functions, in turn, calls other functions. For example, the function rt_garbage_collect, one of the functions called in rt_intern_hash, has 121 lines of code and calls at least 13 other functions. Defendants ask the Court to require that Bedrock point to which lines in the publicly available code Bedrock contends satisfy the requirements of this element of the claim.
d.	means, utilizing the record search means, for accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked	When Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) a system that is especially adapted to include means, utilizing the record search means, for accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked list or its equivalent.	Bedrock fails to explain what in the listed functions it contends are the "means, utilizing the record search means, for accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked list." ip_route_input_mc contains 79 lines of code and at least 19 calls to other functions, which in turn have more lines of code and call other functions.

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	list.	Specifically, the functions ip_route_input_mc, ip_mkroute_input, ip_route_input_slow, ip_mkroute_output, ip_rt_redirect, and/or ip_route_output_slow in module /net/ipv4/route.c. include means, utilizing the record search means, for accessing the linked list and, at the same time, removing at least some of the expired ones of the records in the linked list or its equivalent. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	ip_mkroute_input is 25 lines of code and calls 6 functions. This function serves primarily to call another function, __mkroute_input, which is 95 lines of code and calls at least 18 other functions. ip_route_input_slow is 181 lines of code and calls at least 25 other functions. ip_mkroute_output is 18 lines of code and calls 4 functions. This function serves primarily to call another function, __mkroute_output, which is 119 lines of code and calls at least 18 other functions. ip_rt_redirect is 138 lines of code and calls at least 36 other functions. ip_route_output_slow is 200 lines of code and calls at least 20 other functions. Moreover, the functions ip_mkroute_input and ip_mkroute_output do not exist in Linux versions 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x, 2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x. Defendants ask the Court to require that Bedrock point to which lines in the publicly available code Bedrock contends satisfy the requirements of this element of the claim.
2.	The information storage and retrieval system according to claim 1 further	When Google, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. makes, uses, sells, offers to sell	Bedrock fails to specify what code within rt_intern_hash it contends "dynamically executes based upon comparison with variable ip_rt_gc_elasticity." The function rt_intern_hash

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	including means for dynamically determining maximum number for the record search means to remove in the accessed linked list of records.	or imports (or actively induces or contributes to same) a system that is especially adapted to include means for dynamically determining maximum number for the record search means to remove in the accessed linked list of records or its equivalent. Specifically, code contained within function rt_intern_hash, in module /net/ipv4/route.c, dynamically executes based upon comparison with variable ip_rt_gc_elasticity. In this way, computer equipment configured with or utilizing software based on an Accused Version of Linux includes means for dynamically determining maximum number for the record search means to remove in the accessed linked list of records or its equivalent. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	contains 186 lines of code. Within those lines of code, the function makes calls to at least 20 other functions, some of which are not defined in the route.c file. Each of those functions, in turn, calls other functions. For example, the function rt_garbage_collect, one of the functions called in rt_intern_hash, has 121 lines of code and calls at least 13 other functions. Moreover, within rt_intern_hash and the functions called by rt_intern_hash, the variable ip_rt_gc_elasticity is referenced at least 5 times. Defendants ask the Court to require Bedrock to point to which lines of code it contends dynamically execute based upon comparison with variable ip_rt_gc_elasticity.
7.	A method for storing and retrieving information records using a hashing technique to provide access to the records and using an external chaining technique to store the records with same hash address,	Bedrock does not express a position at this time as to whether the preamble of this claim limits the claim's scope. Nevertheless, Bedrock identifies below aspects of the Accused Instrumentalities that correspond to the claim preamble. When Google, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on Linux version 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x, 2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x, 2.6.12.x, 2.6.13.x, 2.6.14.x, 2.6.15.x, 2.6.16.x, 2.6.17.x, 2.6.18.x,	Bedrock fails to provide separate infringement contentions for each accused version of Linux. The route.c code differs from version to version, with some substantial changes being incorporated into the file over the six year span between the first and latest versions. For example, the functions ip_mkroute_input and ip_mkroute_output, both of which Bedrock points to as accused instrumentalities, do not exist in Linux versions 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x,

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	at least some of the records automatically expiring, the method comprising the steps of:	2.6.19.x, 2.6.20.x, 2.6.21.x, 2.6.22.x, 2.6.23.x, 2.6.24.x, 2.6.25.x, 2.6.26.x, 2.6.27.x, 2.6.28.x, 2.6.29.x, 2.6.30.x, or 2.6.31 (each of which, individually, is an "Accused Version of Linux"), Google, Inc. practices (or induces or contributes to others' practice of) a method for storing and retrieving information records using a hashing technique to provide access to the records and using an external chaining technique to store the records with same hash address, at least some of the records automatically expiring. The Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to store and retrieve information records using a hashing technique to provide access to the records and using an external chaining technique to store the records with same hash address, where at least some of the records automatically expire. In the event this preamble is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this preamble and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x. Moreover, because of Bedrock's failure to specify which lines of code it contends infringes, Defendants cannot determine whether changes in the files affect the infringement contentions. Bedrock fails to specify where in route.c it contends that the records in the hash table "automatically expire." Though it points to rt_hash_table as a structure that "is used to access a linked list of records having the same hash address", that structure is referenced 28 times in the latest accused version of the code, and items pointed to by that structure are referred to hundreds of times (usually as the variable rth or rthp). Moreover, the code is over 3,500 lines in length. Simply pointing to rt_hash_table does not explain where or how Bedrock contends that the records in the linked lists anchored by that structure "automatically expire." Defendants ask the Court to require Bedrock to point to which lines of code it contends satisfy the "automatically expiring" element of the patent claim.
a.	accessing a linked list of records having same hash address,	When Google, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of accessing a linked list of records having same hash address. Computer equipment configured with or utilizing software based on an Accused Version of Linux is	Bedrock fails to specify where in route.c it contends that the the step of "accessing a linked list of records having [the] same hash address" occurs. Though it points to rt_hash_table as a structure that "is used to access the linked list of records having the same hash address," it does not explain how or where in the code it contends

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		especially adapted to access a linked list of records having same hash address. Specifically, data structure rt_hash_table in module /net/ipv4/route.c is used to access a linked list of records having the same hash address. Additionally, code contained within the function rt_intern_hash in module /net/ipv4/route.c is also used to access a linked list of records having the same hash address. In this way, computer equipment configured with or utilizing software based on an Accused Version of Linux practices a method that includes the step of accessing a linked list of records having same hash address. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	that an infringing access occurs, or what in the code constitutes the "same hash address." The rt_hash_table structure is referenced 28 times in the latest accused version of the code, and items pointed to by that structure are referred to hundreds of times (usually as the variable rth or rthp). Moreover, Bedrock fails to specify what code within rt_intern_hash it contends "is used to access the linked list of records having the same hash address." The function rt_intern_hash contains 186 lines of code. Within those lines of code, the function makes calls to at least 20 other functions, some of which are not defined in the route.c file. Each of those functions, in turn, calls other functions. For example, the function rt_garbage_collect, one of the functions called in rt_intern_hash, has 121 lines of code and calls at least 13 other functions. Defendants ask the Court to require Bedrock to point to which lines of code it contends practice this step of the patent claim.
b.	identifying at least some of the automatically expired ones of the records,	When Google, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of identifying at least some of the automatically expired ones of the records. Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to identify at least some of the automatically expired ones of the records. Specifically, code contained within or accessed by the function	Bedrock fails to specify what "code contained within or accessed by the function rt_intern_hash" is used to identify at least some of the expired ones of the records. The function rt_intern_hash contains 186 lines of code. Within those lines of code, the function makes calls to at least 20 other functions, some of which are not defined in the route.c file. Each of those functions, in turn, calls other functions. For example, the function rt_garbage_collect, one of

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		rt_intern_hash in module /net/ipv4/route.c practices a method that includes the step of identifying at least some of the automatically expired ones of the records. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	the functions called in rt_intern_hash, has 121 lines of code and calls at least 13 other functions. Moreover, Bedrock's failure to identify what records it contends are "automatically expired" within the code makes it impossible for Defendants to guess which lines of the rt_intern_hash code Bedrock contends practice this step of the claim. Defendants ask the Court to require that Bedrock point to which lines in the function rt_intern_hash Bedrock contends practice this step of the claim.
c.	removing at least some of the automatically expired records from the linked list when the linked list is accessed, and	When Google, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of removing at least some of the automatically expired records from the linked list when the linked list is accessed. Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to remove at least some of the automatically expired records from the linked list when the linked list is accessed. Specifically, code contained within and/or called by the function rt_intern_hash in module /net/ipv4/route.c practices a method that includes the step of removing at least some of the automatically expired records from the linked list when the linked list is accessed. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any	Bedrock fails to specify what "code contained within or accessed by the function rt_intern_hash" is used to identify at least some of the expired ones of the records. The function rt_intern_hash contains 186 lines of code. Within those lines of code, the function makes calls to at least 20 other functions, some of which are not defined in the route.c file. Each of those functions, in turn, calls other functions. For example, the function rt_garbage_collect, one of the functions called in rt_intern_hash, has 121 lines of code and calls at least 13 other functions. Moreover, Bedrock's failure to identify what records it contends are "automatically expired" within the code makes it impossible for Defendants to guess which lines of the rt_intern_hash code Bedrock contends practice this step of the claim. Defendants ask the Court to require that Bedrock

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		purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	point to which lines in the function rt_intern_hash Bedrock contends practice the requirements of this step of the claim.
d.	inserting, retrieving or deleting one of the records from the system following the step of removing.	When Google, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Google, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of inserting, retrieving or deleting one of the records from the system following the step of removing. Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to insert, retrieve or delete one of the records from the system following the step of removing. Specifically, code contained within the function rt_intern_hash in module /net/ipv4/route.c is used to practice a method that includes the step of inserting one of the records from the system following the step of removing. In the event this limitation is construed so as to be not literally present in the Accused Instrumentalities, Bedrock would alternatively contend that the Accused Instrumentalities meet the recited limitation under the doctrine of equivalents, because any purported differences between this limitation and the aforementioned features of the Accused Instrumentalities would be insubstantial. For example, the aforementioned features of the Accused Instrumentalities would perform substantially the same function, in substantially the same way, to achieve substantially the same result, as the recited limitation.	Because Bedrock has failed to specify where in the code it contends automatically expired records are being removed, Defendants cannot determine what code "is used to practice a method that includes the step of inserting one of the records from the system following the step of removing." Defendants ask the Court to require that Bedrock point to which lines in the function rt_intern_hash Bedrock contends practice the method of this step of the claim.