IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

BEDROCK COMPUTER TECHNOLOGIES LLC,	§ § §	
Plaintiff,	§ §	
	§	**CASE NO. 6:09-cv-269**
v.	§ §	
	§	**Jury Trial Demanded**
SOFTLAYER TECHNOLOGIES, INC., et al.	§ § §	
Defendants.	§ §	

DECLARATION OF JONATHAN R. YIM IN SUPPORT OF PLAINTIFF BEDROCK COMPUTER TECHNOLOGIES LLC'S RESPONSE TO DEFENDANTS' MOTION TO COMPEL PLAINTIFF TO COMPLY WITH PATENT RULE 3-1 AND TO EXTEND THE TIME TO SERVE INVALIDITY CONTENTIONS

I, Jonathan R. Yim, declare as follows:

1.   I am an attorney with the law firm of McKool Smith P.C., counsel of record for Plaintiff in the above-captioned matter. I submit this declaration based on personal knowledge and following a reasonable investigation. If called upon as a witness, I could and would competently testify to the truth of each statement herein.

2.   Attached hereto as Exhibit A is a true and correct copy of a Memorandum Opinion and Order in *Michael S Sutton Ltd. v. Nokia Corp.*, No. 6:07CV203, Dkt. No. 59 (E.D. Tex.), dated February 13, 2009.

3.   Attached hereto as Exhibit B is a true and correct copy of excerpts from ConnecTel's disclosures pursuant to P.R. 3-1 that were attached as Exhibit G to Cisco's motion to compel at issue in *ConnecTel, LLC v. Cisco Systems, Inc.*, No. 2-04CV-396, 391 F. Supp. 2d 526 (E.D. Tex. 2005), dated March 30, 2005.

4. Attached hereto as Exhibit C is a true and correct copy of Bedrock Computer Technologies LLC's First Set of Interrogatories (Nos. 1-3) to Google, Inc. in this litigation, dated November 20, 2009.

5. Attached hereto as Exhibit D is a true and correct copy of an email from Austin Curry to Alan Whitehurst, dated October 29, 2009 at 11:55 AM.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF TEXAS THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: December 22, 2009

Jonathan R. Yim