

Exhibit A

**FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**BEDROCK COMPUTER
TECHNOLOGIES LLC,**

Plaintiff,

v.

**SOFTLAYER TECHNOLOGIES, INC.,
et al.**

Defendants.

§
§
§
§
§
§
§
§
§
§
§

CASE NO. 6:09-cv-269-LED

Jury Trial Demanded

**DECLARATION OF J. AUSTIN CURRY
IN SUPPORT OF BEDROCK'S RESPONSE TO GOOGLE'S MOTION FOR LEAVE
TO FILE NOTICE OF SUPPLEMENTAL FACTS REGARDING DEFENDANTS'
MOTION TO COMPEL PLAINTIFF TO COMPLY WITH PATENT RULE 3-1 AND TO
EXTEND THE TIME TO SERVE INVALIDITY CONTENTIONS**

I, J. Austin Curry, 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.1 is a true and correct copy of a letter, excluding the enclosure, written on behalf of Bedrock, requesting for production of source code to all Defendants dated February 3, 2010.

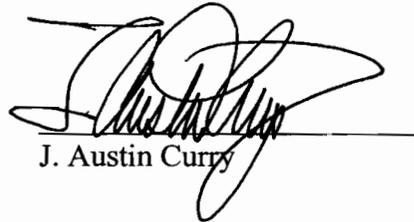
3. Attached hereto as Exhibit A.2 is a true and correct copy of an email requesting the production of source code to all Defendants dated February 25, 2010.

4. Attached hereto as Exhibit A.3 is a true and correct copy of an email requesting the production of source code to all Defendants dated March 16, 2010.

5. During the conference for Google's Motion for Leave, Google's counsel admitted that, if Bedrock had simply responded to Interrogatory No. 7 with its P.R. 3-1 claim charts, Google would have moved the Court to compel a sufficient response from Bedrock.

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: March 19, 2010



J. Austin Curry