

EXHIBIT B

BEDROCK COMPUTER TECHS., LLC v. SOFTLAYER TECH. SOLUTIONS, LLC, ET. AL

PLAINTIFF’S P.R. 3-1 INFRINGEMENT CONTENTIONS¹

	Claim Language	Accused Instrumentalities: Computer equipment configured with or utilizing software based on an Accused Version of Linux
1.	An information storage and retrieval system, the system comprising:	<p>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.</p> <p>When Amazon.com, 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”), Amazon.com, 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.</p> <p>In the event this preamble is construed so as to be not literally present in the Accused</p>

¹ The contentions contained in this chart are based on functionality observable through the open source versions of Linux that are publicly available. **All of the limitations of the asserted claims of the ’120 patent include features that relate to software of the Accused Instrumentalities. The actual source code of Linux that is installed on Amazon.com, Inc.’s servers and other device(s) is not publicly available and has not yet been produced for inspection. Bedrock reserves the right to supplement or modify these contentions once Amazon.com, Inc. has produced this code and Bedrock has completed its review of the source code.**

Bedrock’s identification of specific routines is not intended to identify all of the code necessary to satisfy the claim limitation at issue. Other source and/or object code components, such as routines, functions, methods, macros, classes, data structures, libraries etc. may be necessary. Furthermore, these identified code components may be called by or call other code components. Also, the code components identified are normally the first or the most relevant in a series of code components and are intended to reference the entire function path. Bedrock reserves its right to provide additional detail in its expert report according to the schedule set by the Court.

	Claim Language	Accused Instrumentalities: Computer equipment configured with or utilizing software based on an Accused Version of Linux
		<p>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.</p>
(a) ²	<p>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,</p>	<p>When Amazon.com, 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, Amazon.com, 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.</p> <p>Within each and every Accused Version of Linux, data structure <code>rt_hash_table</code> in module <code>/net/ipv4/route.c</code>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.</p> <p>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</p>

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.

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		<p>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.</p>
(b)	<p>a record search means utilizing a search key to access the linked list,</p>	<p>When Amazon.com, 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, Amazon.com, 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.</p> <p>Specifically, code contained within functions <code>ip_route_input_mc</code>, <code>ip_mkroute_input</code>, <code>ip_route_input_slow</code>, <code>ip_mkroute_output</code>, <code>ip_rt_redirect</code>, and/or <code>ip_route_output_slow</code> in module <code>/net/ipv4/route.c</code> calls functions <code>rt_hash</code> and <code>rt_intern_hash</code>. 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.</p> <p>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.</p>

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(c)	<p>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, and</p>	<p>When Amazon.com, 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, Amazon.com, 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.</p> <p>Specifically, code contained within function <code>rt_intern_hash</code>, as invoked by functions <code>ip_route_input_mc</code>, <code>ip_mkroute_input</code>, <code>ip_route_input_slow</code>, <code>ip_mkroute_output</code>, <code>ip_rt_redirect</code>, and/or <code>ip_route_output_slow</code> in module <code>/net/ipv4/route.c</code>, 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.</p> <p>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.</p>
(d)	<p>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.</p>	<p>When Amazon.com, 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, Amazon.com, 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</p>

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		<p>list or its equivalent.</p> <p>Specifically, the functions <code>ip_route_input_mc</code>, <code>ip_mkroute_input</code>, <code>ip_route_input_slow</code>, <code>ip_mkroute_output</code>, <code>ip_rt_redirect</code>, and/or <code>ip_route_output_slow</code> in module <code>/net/ipv4/route.c</code>. 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.</p> <p>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.</p>
2.	The information storage and retrieval system according to claim 1 further including means for dynamically determining maximum number for the record search means to remove in the accessed linked list of records.	<p>When Amazon.com, 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, Amazon.com, 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 for dynamically determining maximum number for the record search means to remove in the accessed linked list of records or its equivalent.</p> <p>Specifically, code contained within function <code>rt_intern_hash</code>, in module <code>/net/ipv4/route.c</code>, dynamically executes based upon comparison with variable <code>ip_rt_gc_elasticity</code>. 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.</p>

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		<p>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.</p>
3.	<p>A method for storing and retrieving information records using a linked list to store and provide access to the records, at least some of the records automatically expiring, the method comprising the steps of:</p>	<p>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.</p> <p>When Amazon.com, 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, 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”), Amazon.com, Inc. practices (or induces or contributes to others’ practice of) a method for storing and retrieving information records that uses a linked list to store and provide access to the records, where at least some of the records are automatically expiring. 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 linked list to store and provide access to the records, where at least some of the records are automatically expiring.</p> <p>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</p>

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		<p>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.</p>
(a)	<p>accessing the linked list of records,</p>	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of accessing the linked list of records. Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to access a linked list of records.</p> <p>Specifically, the data structure <code>rt_hash_table</code> in module <code>/net/ipv4/route.c</code> is used to access the linked list of records. Additionally, code contained within the function <code>rt_intern_hash</code> in module <code>/net/ipv4/route.c</code> is also used to access the linked list of records.</p> <p>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.</p>
(b)	<p>identifying at least some of the automatically expired ones of the</p>	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux,</p>

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	records, and	<p>Amazon.com, 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.</p> <p>Specifically, code contained within or accessed by the function <code>rt_intern_hash</code> in module <code>/net/ipv4/route.c</code> is used to practice a method that includes the step of identifying at least some of the automatically expired ones of the records.</p> <p>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.</p>
(c)	removing at least some of the automatically expired records from the linked list when the linked list is accessed.	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, 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.</p> <p>Specifically, code contained within the function <code>rt_intern_hash</code> in module</p>

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		<p>/net/ipv4/route.c is used to practice 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.</p> <p>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.</p>
4.	<p>The method according to claim 3 further including the step of dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed.</p>	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed.</p> <p>Specifically, code contained within function <code>rt_intern_hash</code> (in module <code>/net/ipv4/route.c</code>) that dynamically executes based upon comparison with variable <code>ip_rt_gc_elasticity</code> is used to perform the claimed act(s). 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 dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed. Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to dynamically determine maximum number of expired ones of the records to remove when the linked list is accessed.</p> <p>In the event this limitation is construed so as to be not literally present in the Accused</p>

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		<p>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.</p>
5.	<p>An information storage and retrieval system, the system comprising:</p>	<p>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.</p> <p>When Amazon.com, 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”), Amazon.com, 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.</p> <p>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</p>

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		limitation.
(a)	a hashing means to provide access to records stored in a memory of the system and using an external chaining technique to store the records with same hash address, at least some of the records automatically expiring,	<p>When Amazon.com, 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, Amazon.com, 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 hashing means to provide access to records stored in a memory of the system and using an external chaining technique to store the records with same hash address, where at least some of the records are automatically expiring or its equivalent.</p> <p>Specifically, data structure <code>rt_hash_table</code> in module <code>/net/ipv4/route.c</code> implements a hashing means to provide access to records stored in a memory of the system and using an external chaining technique to store the records with same hash address, where at least some of the records automatically are expiring or its equivalent.</p> <p>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.</p>
(b)	a record search means utilizing a search key to access a linked list of records having the same hash address,	When Amazon.com, 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, Amazon.com, 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 a linked list of records having the same hash address or its equivalent.

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		<p>Specifically, code contained within functions <code>ip_route_input_mc</code>, <code>ip_mkroute_input</code>, <code>ip_route_input_slow</code>, <code>ip_mkroute_output</code>, <code>ip_rt_redirect</code>, and/or <code>ip_route_output_slow</code> in module <code>/net/ipv4/route.c</code> calls functions <code>rt_hash</code> and <code>rt_intern_hash</code>. 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 a linked list of records having the same hash address or its equivalent.</p> <p>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.</p>
(c)	the record search means including means for identifying and removing at least some expired ones of the records from the linked list of records when the linked list is accessed, and	<p>When Amazon.com, 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, Amazon.com, Inc. makes, uses, sells, offers to sell or imports (or actively induces or contributes to same) a system that is especially adapted to include the record search means including means for identifying and removing at least some expired ones of the records from the linked list of records when the linked list is accessed or its equivalent.</p> <p>Specifically, code contained within function <code>rt_intern_hash</code>, as invoked by functions <code>ip_route_input_mc</code>, <code>ip_mkroute_input</code>, <code>ip_route_input_slow</code>, <code>ip_mkroute_output</code>, <code>ip_rt_redirect</code>, and/or <code>ip_route_output_slow</code> in module <code>/net/ipv4/route.c</code> comprises record search means including means for identifying and removing at least some expired ones of the records from the linked list of records when the linked list is accessed or its</p>

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		<p>equivalent.</p> <p>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.</p>
(d)	<p>mea[n]s, utilizing the record search means, for inserting, retrieving, and deleting records from the system and, at the same time, removing at least some expired ones of the records in the accessed linked list of records.</p>	<p>When Amazon.com, 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, Amazon.com, 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 inserting, retrieving, and deleting records from the system and, at the same time, removing at least some expired ones of the records in the accessed linked list of records or its equivalent.</p> <p>Specifically, the functions <code>ip_route_input_mc</code>, <code>ip_mkroute_input</code>, <code>ip_route_input_slow</code>, <code>ip_mkroute_output</code>, <code>ip_rt_redirect</code>, and/or <code>ip_route_output_slow</code> in module <code>/net/ipv4/route.c</code> include means, utilizing the record search means, for inserting, retrieving, and deleting records from the system and, at the same time, removing at least some expired ones of the records in the accessed linked list of records or its equivalent.</p> <p>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</p>

	Claim Language	Accused Instrumentalities: Computer equipment configured with or utilizing software based on an Accused Version of Linux
		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.
6.	The information storage and retrieval system according to claim 5 further including means for dynamically determining maximum number for the record search means to remove in the accessed linked list of records.	<p>When Amazon.com, 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, Amazon.com, 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 for dynamically determining maximum number for the record search means to remove in the accessed linked list of records or its equivalent.</p> <p>Specifically, code contained within function <code>rt_intern_hash</code> (in module <code>/net/ipv4/route.c</code>) dynamically executes based upon comparison with variable <code>ip_rt_gc_elasticity</code>. 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.</p> <p>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.</p>
7.	A method for storing and retrieving information records using a hashing technique to provide access to the records and	<p>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.</p> <p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer</p>

	Claim Language	Accused Instrumentalities: Computer equipment configured with or utilizing software based on an Accused Version of Linux
	<p>using an external chaining technique to store the records with same hash address, at least some of the records automatically expiring, the method comprising the steps of:</p>	<p>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”), Amazon.com, 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.</p> <p>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.</p>
(a)	<p>accessing a linked list of records having same hash address,</p>	<p>When Amazon.com, Inc. uses (or induces or contributes to others’ use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, 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</p>

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		<p>of Linux is especially adapted to access a linked list of records having same hash address.</p> <p>Specifically, data structure <code>rt_hash_table</code> in module <code>/net/ipv4/route.c</code> is used to access a linked list of records having the same hash address. Additionally, code contained within the function <code>rt_intern_hash</code> in module <code>/net/ipv4/route.c</code> 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.</p> <p>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.</p>
(b)	identifying at least some of the automatically expired ones of the records,	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, 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.</p> <p>Specifically, code contained within or accessed by the function <code>rt_intern_hash</code> in module <code>/net/ipv4/route.c</code> practices a method that includes the step of identifying at least some of the automatically expired ones of the records.</p>

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		<p>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.</p>
(c)	<p>removing at least some of the automatically expired records from the linked list when the linked list is accessed, and</p>	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, 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.</p> <p>Specifically, code contained within and/or called by the function <code>rt_intern_hash</code> in module <code>/net/ipv4/route.c</code> 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.</p> <p>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,</p>

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		in substantially the same way, to achieve substantially the same result, as the recited limitation.
(d)	inserting, retrieving or deleting one of the records from the system following the step of removing.	<p>When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, 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.</p> <p>Specifically, code contained within the function <code>rt_intern_hash</code> in module <code>/net/ipv4/route.c</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.</p> <p>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.</p>
8.	The method according to claim 7 further including the step of dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed.	When Amazon.com, Inc. uses (or induces or contributes to others' use of) computer equipment configured with or utilizing software based on an Accused Version of Linux, Amazon.com, Inc. practices (or induces or contributes to others' practice of) a method that includes the step of dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed. Computer equipment configured with or utilizing software based on an Accused Version of Linux is especially adapted to

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		<p>dynamically determine maximum number of expired ones of the records to remove when the linked list is accessed.</p> <p>Specifically, code contained within function <code>rt_intern_hash</code>, in module <code>/net/ipv4/route.c</code>, dynamically executes based upon comparison with variable <code>ip_rt_gc_elasticity</code>. 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 dynamically determining maximum number of expired ones of the records to remove when the linked list is accessed.</p> <p>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.</p>