

Exhibit B

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

BEDROCK COMPUTER TECHNOLOGIES	§	
LLC,	§	
PLAINTIFF	§	
	§	
VS.	§	CIVIL ACTION NO. 6:09-cv-269-LED-JDL
	§	
SOFTLAYER TECHNOLOGIES, INC.,	§	
CITIWARE TECHNOLOGY SOLUTIONS,	§	JURY TRIAL DEMANDED
LLC, GOOGLE, INC., YAHOO!, INC.,	§	
MYSAPCE INC., AMAZON.COM INC.,	§	
PAYPAL INC., MATCH.COM, INC.,	§	
AOL LLC, and CME GROUP INC.,	§	
DEFENDANTS	§	

YAHOO!'S NOTICE OF SUBPOENA TO MICROSOFT CORPORATION

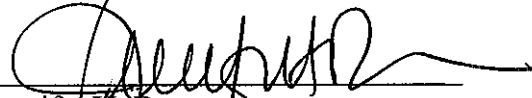
PLEASE TAKE NOTICE that pursuant to Rules 30 and 45 of the Federal Rules of Civil Procedure, Defendant Yahoo!, Inc, ("Yahoo!") in the above-captioned action demands, by subpoena, testimony and document production from Microsoft Corporation ("Microsoft"), a copy of which is attached hereto.

PLEASE TAKE FURTHER NOTICE that Microsoft is a non-party to the action. So far as is known to Yahoo!, Microsoft is located at the address of 1 Microsoft Way, Redmond, WA 98052.

The requested documents are to be produced on or before 5:00 p.m. on January 5, 2011 and the deposition is to take place at 9:00 a.m. on January 10, 2011, at the offices of Byers & Anderson, at 600 University Street, Suite 2300, Seattle, WA 98101. The deposition will be

recorded by stenographic and video means. The deposition will continue from day to day until completed. You are invited to attend and cross examine.

Respectfully submitted,



Jennifer H. Doan

Texas Bar No. 08809050

John Scott Andrews

Texas Bar No. 24064823

HALTOM & DOAN

Crown Executive Center, Suite 100

6500 Summerhill Road

Texarkana, TX 75503

Telephone: (903) 255-1000

Facsimile: (903) 255-0800

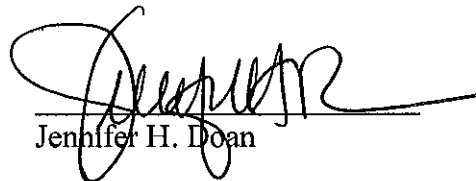
Email: jdoan@haltomdoan.com

Email: sandrews@haltomdoan.com

**ATTORNEYS FOR
YAHOO!, INC.**

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been forwarded to Plaintiff's counsel of record by electronic mail and certified mail, return receipt requested, and to all other counsel of record by electronic mail on the 29th day of December, 2010.



Jennifer H. Doan

UNITED STATES DISTRICT COURT
for the
Western District of Washington

Bedrock Computer Technologies LLC
Plaintiff
v.
Softlayer Technologies, Inc., et al.
Defendant

Civil Action No. 6:09-cv-269
(If the action is pending in another district, state where:
Eastern District of Texas)

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Microsoft Corporation, 1 Microsoft Way, Redmond, WA 98052

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is not a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

ALL TOPICS SET FORTH IN ATTACHMENT "A"

Table with 2 columns: Place (Byers & Anderson, 600 University Street, Suite 2300, Seattle, WA 98101) and Date and Time (01/10/2011 9:00 am)

The deposition will be recorded by this method: Video and Stenographer

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

ALL DOCUMENTS SET FORTH AND/OR DESCRIBED IN TOPICS 1-3 of ATTACHMENT "B"

Date: January 5, 2011
Location: Byers & Anderson
600 University Street, Suite 2300, Seattle, WA 98101

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 12/29/2010
CLERK OF COURT

OR
[Handwritten Signature]
Attorney's Signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Jennifer Doan
Yahoo! Inc., who issues or requests this subpoena, are:

Haltom & Doan
6500 Summerhill Road, Suite 100, Texarkana, TX 75503
903.255.1000, jdoan@haltomdoan.com

Civil Action No. 6:09-cv-269

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I served the subpoena by delivering a copy to the named individual as follows: _____

_____ on *(date)* _____; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party's officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) When Permitted. To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party; or

(iii) a person who is neither a party nor a party's officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:

(A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

ATTACHMENT A

Pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, Microsoft Corporation must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on Microsoft Corporation's behalf concerning the topics set forth and/or described below.

Definitions

A. "YOU," "YOUR" or "MICROSOFT" means Microsoft Corporation, along with its agents, officers, directors, employees, affiliates, subsidiaries, parents, and predecessors-in-interest.

B. "MICROSOFT PRIOR ART" means Windows NT 3.5, Windows NT 3.51 and Windows NT 4.0, including the TCPIP service, Routing and Remote Access Service, and NT Load Balancing Service.

C. "DOCUMENT" shall have the meaning" and scope of that term as used in Fed. R. Civ. P. 34 including the terms "writings and recordings," "photographs," "originals," and "duplicate" as defined in Fed. R. Evid. 1001, and includes, without limitation, the following items whether printed, recorded, stored or saved electronically, microfilmed, or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or confidential or personal: letters; memoranda; reports; records; agreements; working papers; communications; correspondence; summaries or records of personal conversations; diaries; forecasts; statistical statements; graphs; laboratory or research reports and notebooks; charts; minutes or records of conferences; expressions or statements of policy; lists of persons attending meetings or conferences; reports or summaries of interviews; reports or summaries of investigations; opinions or reports of consultants; patent appraisals; opinions of counsel; reports or summaries of either negotiations within or external to the corporation or preparations for such; brochures; manuals; pamphlets; advertisements; circulars; press releases; drafts of any

documents; memoranda; books; instruments; accounts; bills of sale; invoices; tapes; electronic communications, including, but not limited to, emails; telegraphic communications and all other material of any tangible medium of expression; and original or preliminary notes. Any comment or notation appearing on any document, and not part of the original text, is to be considered a separate “document.”

D. “COMMUNICATION” or “COMMUNICATIONS” means, without limitation, any transmission, conveyance or exchange of a word, statement, fact, thing, idea, DOCUMENT, instruction, information, demand or question by any medium, whether by written, oral or other means.

E. “REFLECT,” “REFLECTING,” “RELATED TO,” “REFER TO,” “RELATING TO,” “REFERRING TO,” and “REGARDING” means referring to, relating to, describing, discussing, constituting, comprising, evidencing, pertaining to, concerning, mentioning, containing, reflecting, displaying, showing, identifying, proving, disproving, consisting, contradicting, being in any way legally, logically, or factually connected with the matters referenced, or having a tendency to prove or disprove any matter referenced.

Deposition Topics

1. The functionality reflected in the DOCUMENTS including but not limited to source code produced in response to Document Request Nos. 1-3.

2. The AUTHENTICATION and ADMISSIBILITY of the DOCUMENTS including but not limited to source code produced in response to Document Request Nos. 1-3.

ATTACHMENT B

Defendant Yahoo!, hereby requests that the Microsoft Corporation produce the following materials, documents and records in your possession, custody or control, by the time, date and location indicated in the accompanying subpoena, or at such other time, date, and location as may be agreed to by counsel.

Instructions

1. In responding to this subpoena, YOU are requested to furnish all DOCUMENTS or things in YOUR possession, custody, or control, regardless of whether such DOCUMENTS or things are possessed directly by YOU or YOUR employees, attorneys, or any other person or persons acting on YOUR behalf.

2. In producing DOCUMENTS for inspection, YOU are requested to produce the original of each DOCUMENT together with all non-identical copies and drafts of that DOCUMENT. A copy of a DOCUMENT bearing a comment, notation, or marking of any kind, which is not a part of the original, shall be considered a separate document. Any draft, preliminary or superseded version of any DOCUMENT is considered to be a separate DOCUMENT.

3. All DOCUMENTS that are maintained in electronic form should be produced in electronic form even if a paper copy of the same DOCUMENT was produced.

4. DOCUMENTS attached to each other should not be separated.

5. If any requested DOCUMENT or thing cannot be produced in full, please produce it to the extent possible, indicating what is being withheld and the reason it is being withheld.

6. If any requested DOCUMENT is withheld on the grounds of privilege, please provide the information required by Federal Rule of Civil Procedure 26(b)(5)(A).

7. Please produce DOCUMENTS and things responsive to these requests as they are kept in the usual course of business, or alternatively, organized and labeled to correspond to each request to which the DOCUMENTS or things are responsive.

Document Requests

1. DOCUMENTS including but not limited to source code sufficient to show the marking of routes for garbage collection and the removing of routes marked for garbage collection in the routing functionality of the MICROSOFT PRIOR ART.

2. DOCUMENTS including but not limited to source code sufficient to show the data structures and storing of routes in the routing functionality of the MICROSOFT PRIOR ART of Request No. 1, including but not limited to any hashing functionality and linked lists.

3. DOCUMENTS including but not limited to source code sufficient to show garbage collection from the routing cache of the MICROSOFT PRIOR ART and the data structures and storing of routes in the routing cache of the MICROSOFT PRIOR ART, including but not limited to any hashing functionality and linked lists.

Civil Action No. 6:09-cv-269

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* MICROSOFT CORPORATION
was received by me on *(date)* 12/31/2010

I served the subpoena by delivering a copy to the named individual as follows: _____

PTSGE CORP. : 925-4th AVE / STE 2900, SEATTLE, WA 98104

"JOSEPH F. FRASSIRAND" - VISE PRESIDENT on *(date)* 1/3/2011; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of

\$ 55.35

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00

I declare under penalty of perjury that this information is true.

Date: 1/3/2011

Michael W. Graham
Server's signature

MICHAEL W. GRAHAM
Printed name and title

KKWT PROCESS SERVICES

P. O. BOX 4623

SPANAWAY, WA 98387

BUS: (253) 565-6670
Server's address

Additional information regarding attempted service, etc: