

EXHIBIT A

Bedrock Computer Techs., LLC
v.
Softlayer, et al.

Case No. 6:09-cv-00269

Claim Construction Hearing
Defendants' Presentation

The Honorable John D. Love

October 7, 2010

Hashing Means...

The Pseudocode Provides No Algorithm For Hashing

- “hash(record_key)” says a record is being hashed, but not how.

```
Search Table Procedure

function search_table (record_key: record_key_type;
    var position: list_element_pointer;
    var previous_position: list_element_pointer;
    var index: 0 . . . table_size - 1): boolean;
/* Search table for record_key and delete expired records in target list; if found, position is made to
point to located record and previous_position to its predecessor, and TRUE is returned; otherwise
FALSE is returned. index is set to table subscript
case. */
var p: list_element_pointer;
    previous_p: list_element_pointer;
begin
    index := hash (record_key);
    p := table[index];
    previous_p := nil;
    position := nil;
    previous_position := nil;
    while p ≠ nil
        /* HEART OF THE TECHNIQUE: Traverse entire list, deleting
        /* expired records as we search. */
        begin
            if p↑.record_contents is expired
                then remove (p, previous_p, index) /* ON-THE-FLY REMOVAL OF EXPIRED RECORD! */
            else begin
                if position = nil then if p↑.record_contents.key = record_key
                    /* If this is record wanted,*/
                    then begin position := p; previous_position := previous_p end;
                    /* save its position. */
                previous_p := p;
                /* Advance to */
                p := p↑.next
                /* next record. */
            end
            /* else begin */
        end;
    return (position ≠ nil)
/* Return TRUE if record located, otherwise FALSE. */
end
/* search_table */
```

index := hash (record_key);

'120 Patent Cols. 11-12

Hashing Means...

The Pseudocode Provides No Algorithm For Hashing

- “hash(record_key)” is not an algorithm.

```
index := hash (record_key);
```

does not disclose a structure for hashing any more than

```
treat (cancer);
```

discloses a structure for treating cancer.

Choosing Between “Search Table” and “Alternate Search Table” Does Not Determine a Maximum

- The Search Table procedure removes all expired records it encounters.
- The Alternate Search Table procedure also removes all expired records encountered. However, because the entire list may not be traversed, some expired records may remain.
- There is no upper bound on these removals.