

# EXHIBIT G

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

08:52:24

Case No.6:09-CV-00269

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BEDROCK COMPUTER TECHNOLOGIES :
LLC,                             :
                                :
      Plaintiff,                 :
                                :
      V.                          :
                                :
SOFTLAYER TECHNOLOGIES, INC.,    :
CITIWARE TECHNOLOGY SOLUTIONS  :
LLC, GOOGLE INC., YAHOO! INC.,  :
MYSFACE INC., AMAZON.COM INC.,  :
MATCH.COM, LLC, AOL LLC,        :
      Defendants.               :
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DATE: December 30, 2010  
TIME: 10:19 a.m.

Volume III

HIGHLY CONFIDENTIAL

VIDEOTAPE Deposition of RICHARD NEMES, taken by and before JOYCE SILVER, a Certified Shorthand Reporter and Notary Public of the State of New York, and DEVERELL WRITE, Videographer, held at the office of McCOOL SMITH, P.C., One Bryant Park, New York, New York.

Job No. CS304837

Highly Confidential

741	1 09:22:30 2 THE VIDEOGRAPHER: We are on the 09:11:37 3 record. Today's date is December 30, 2010. The 09:16:30 4 time on the video monitor is 9:17 a.m. This is 09:16:35 5 the beginning of tape number one, Volume 3 of 09:16:39 6 the continued videotape deposition of Dr. 09:16:43 7 Richard Nemes. 09:16:45 8 R I C H A R D N E M E S, having been 11:21:31 9 previously affirmed, continues to testify as 11:21:31 10 follows: 11:21:31 11 DIRECT EXAMINATION BY MR. CHAIKOVSKY: 09:16:50 12 Q. Hi, Dr. Nemes. This is Yar 09:16:50 13 Chaikovsky from McDermott, Will and Emery 09:16:55 14 representing Yahoo. You are still under oath. 09:16:56 15 Do you recognize that you are still under oath 09:16:59 16 as you were yesterday? 09:17:01 17 A. Yes. 09:17:02 18 Q. Thank you. Dr. Nemes, you didn't 09:17:02 19 invent hash tables, did you? 09:17:08 20 A. Excuse me? 09:17:09 21 Q. You did not invent hash tables, did 09:17:10 22 you? 09:17:13 23 A. No. 09:17:13 24 Q. And you didn't invent the technique 09:17:13 25 of external chaining for resolving collisions of 09:17:17	743	1 Q. And you didn't invent the idea of 09:18:17 2 searching a database, did you? 09:18:21 3 A. No, I did not. 09:18:22 4 Q. And you did not invent linked 09:18:23 5 lists, did you? 09:18:26 6 A. No. 09:18:27 7 Q. And you did not invent deleting 09:18:27 8 records from a database, did you? 09:18:34 9 A. No. 09:18:37 10 Q. And you did not invent identifying 09:18:37 11 which record or records should be deleted from a 09:18:39 12 database, did you? 09:18:41 13 A. No. 09:18:43 14 Q. And you did not invent the idea of 09:18:46 15 storing a record in an external chain, did you? 09:18:49 16 A. No. 09:18:52 17 Q. And you did not invent the idea of 09:18:52 18 deleting records stored in an external chain, 09:18:56 19 did you? 09:18:58 20 A. No. 09:19:00 21 Q. And you did not invent identifying 09:19:01 22 a record in an external chain for deletion, did 09:19:03 23 you? 09:19:09 24 A. No. 09:19:09 25 Q. And you did not invent removing a 09:19:11
742	1 a hash table; is that correct? 09:17:19 2 A. That's correct. 09:17:21 3 Q. And you did not invent the 09:17:22 4 technique of linear probing for collisions to a 09:17:23 5 hash table did you? 09:17:25 6 A. No, I did not. 09:17:26 7 Q. Those techniques have been around 09:17:27 8 long before you ever began teaching in the 09:17:30 9 field. Correct? 09:17:33 10 A. Well, I have to think about it. I 09:17:34 11 know the dates here. I would say that's 09:17:42 12 probably accurate. 09:17:49 13 Q. So, again, those techniques have 09:17:50 14 been around for longer -- long before you ever 09:17:52 15 began teaching in the field. Correct? 09:17:56 16 A. Correct. 09:17:58 17 Q. And the same is true about 09:17:58 18 quadratic probing; is that correct? 09:18:01 19 A. That's correct. 09:18:02 20 Q. And the same is true about random 09:18:03 21 programming -- probing. Correct? 09:18:05 22 A. That's correct. You know, you 09:18:06 23 characterized it as "long before," so I'm not 09:18:09 24 sure what you're -- how long you call long, but 09:18:11 25 it was before I started teaching. 09:18:15	744	1 record from an external chain after identifying 09:19:14 2 it for deletion, did you? 09:19:17 3 A. I'm not sure, but I think maybe 09:19:21 4 "remove" is one of the terms that has been 09:19:24 5 construed in the claims construction by the 09:19:28 6 court. So I'd like to answer that in view of 09:19:31 7 however the court has construed that. 09:19:35 8 Q. Okay. 09:19:38 9 A. So if you could provide the claims 09:19:39 10 construction in there or read it to me? I don't 09:19:43 11 want to -- I don't want to like just answer that 09:19:48 12 in the abstract. 09:19:51 13 Q. Do you know how the court construed 09:19:52 14 the claim -- the term "removing"? 09:19:55 15 A. No, I don't. 09:19:58 16 Q. Okay. Let me ask it two ways. 09:20:00 17 Without using the court's construction, using 09:20:01 18 your own interpretation of the word "removing," 09:20:03 19 I'll ask the question. You did not invent 09:20:09 20 removing a record from an external chain after 09:20:11 21 identifying it for deletion, did you? 09:20:14 22 MR. AURENTZ: Object to form. 09:20:19 23 A. I have a little bit of trouble with 09:20:21 24 the word "removing" there because, you know, you 09:20:24 25 could take it -- it depends on the context, you 09:20:27