

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**BEDROCK COMPUTER
TECHNOLOGIES LLC,**

Plaintiff,

v.

**SOFTLAYER TECHNOLOGIES, INC.,
CITIWARE TECHNOLOGY
SOLUTIONS, LLC, GOOGLE INC.,
YAHOO! INC., MYSPACE INC.,
AMAZON.COM INC., PAYPAL INC.,
MATCH.COM, INC., AOL INC., AND
CME GROUP INC.,**

Defendants.

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CASE NO. 6:09-cv-269

Jury Trial Demanded

**BEDROCK COMPUTER TECHNOLOGIES LLC’S REPLY TO DEFENDANT
AMAZON.COM, INC.’S ANSWER TO BEDROCK’S
THIRD AMENDED COMPLAINT FOR PATENT INFRINGEMENT**

Plaintiff Bedrock Computer Technologies LLC (“Bedrock”) files this Reply to Defendant Amazon.com, Inc.’s (“Amazon”) Answer to Bedrock’s Third Amended Complaint filed on February 10, 2011 (Dkt. No. 470). All allegations not expressly admitted are denied. Paragraphs marked 1-28 of Amazon’s Answer to Bedrock’s Third Amended Complaint do not require a response.

PRAYER FOR RELIEF

Bedrock denies Amazon’s claim that Bedrock is not entitled to any relief requested.

AFFIRMATIVE DEFENSES

Bedrock incorporates by reference the allegations in its Third Amended Complaint for Patent Infringement (Dkt. No. 410)¹ in response to each and every of Amazon's Affirmative Defenses.

1. Bedrock denies the allegations contained in Amazon's First Affirmative Defense.
2. Bedrock denies the allegations contained in Amazon's Second Affirmative Defense.
3. Bedrock denies the allegations contained in Amazon's Third Affirmative Defense.
4. Bedrock denies the allegations contained in Amazon's Fourth Affirmative Defense.
5. Bedrock denies the allegations contained in Amazon's Fifth Affirmative Defense.
6. Bedrock denies the allegations contained in Amazon's Sixth Affirmative Defense.
7. Bedrock denies the allegations contained in Amazon's Seventh Affirmative Defense.
8. Bedrock denies the allegations contained in Amazon's Eighth Affirmative Defense.

PRAYER FOR RELIEF

Bedrock incorporates by reference the Prayer for Relief set forth in Bedrock's Third Amended Complaint for Patent Infringement. Bedrock denies that Amazon.com, Inc. is entitled to any relief requested.

¹ Incorrectly filed and titled "First Amended Complaint for Patent Infringement."

DATED: March 2, 2011.

Respectfully submitted,

McKOOL SMITH, P.C.

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this document was served on all counsel who has consented to electronic service on March 2, 2011. Local Rule CV-5(a)(3)(A).

/s/ Jason D. Cassady

Jason D. Cassady