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

BEDROCK COMPUTER	§	
TECHNOLOGIES LLC,	§	
	§	
Plaintiff,	§	
,	8	CASE NO. 6:09-cv-269
V.	§	
	§	Jury Trial Demanded
SOFTLAYER TECHNOLOGIES, INC.,	§	v
CITIWARE TECHNOLOGY	§	
SOLUTIONS, LLC, GOOGLE INC.,	§	
YAHOO! INC., MYSPACE INC.,	§	
AMAZON.COM INC., PAYPAL INC.,	8	
MATCH.COM, INC., AOL INC., AND	8	
CME GROUP INC.,	8	
	8	
Defendants.	8	
_ 11/11/4/11/01	o	

BEDROCK COMPUTER TECHNOLOGIES LLC'S REPLY TO DEFENDANT SOFTLAYER TECHNOLOGIES, INC.'S ANSWER TO BEDROCK'S THIRD AMENDED COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Bedrock Computer Technologies LLC ("Bedrock") files this Reply to Defendant Softlayer Technologies, Inc.'s ("Softlayer") Answer to Bedrock's Third Amended Complaint filed on February 10, 2011 (Dkt. No. 469). All allegations not expressly admitted are denied. Paragraphs marked 1-28 of Softlayer's Answer to Bedrock's Third Amended Complaint do not require a response.

PRAYER FOR RELIEF

Bedrock denies Softlayer'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 Softlayer's Affirmative Defenses.

- 1. Bedrock denies the allegations contained in Softlayer's First Affirmative Defense.
- 2. Bedrock denies the allegations contained in Softlayer's Second Affirmative Defense.
- 3. Bedrock denies the allegations contained in Softlayer's Third Affirmative Defense.
- 4. Bedrock denies the allegations contained in Softlayer's Fourth Affirmative Defense.
 - 5. Bedrock denies the allegations contained in Softlayer's Fifth Affirmative Defense.
- 6. Bedrock denies the allegations contained in Softlayer's Sixth Affirmative Defense.
- 7. Bedrock denies the allegations contained in Softlayer's Seventh Affirmative Defense.
- 8. Bedrock denies the allegations contained in Softlayer'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 Softlayer Technologies, Inc. is entitled to any relief requested.

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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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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
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