

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.

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

DATED: March 2, 2011.

Respectfully submitted,

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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

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