

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

Bedrock Computer Technologies LLC,

Plaintiff,

v.

Softlayer Technologies, Inc.,  
et al.

Defendants.

Case No. 6:09-CV-269-LED

JURY TRIAL DEMANDED

**DEFENDANTS' IDENTIFICATION OF PRIOR ART PURSUANT TO 35 U.S.C. § 282**

Pursuant to 35 U.S.C. § 282, SoftLayer Technologies, Inc., Google Inc., Yahoo! Inc., MySpace, Inc., Amazon.com Inc., Match.com, LLC and AOL Inc. (collectively "Defendants") hereby submit this identification of prior art to be relied upon for anticipation and/or obviousness of the patent-in-suit, and/or to show the state of the art. Defendants incorporate by reference their Final Invalidity Contentions and the expert reports of Dr. Kevin Jeffay and Mr. Joel Williams, and reserve the right to supplement this statement as appropriate.

- U.S. Patent No. 6,119,214, Dirks, September 12, 2000.
- U.S. Patent No. 5,121,495, Nemes, June 9, 1992.
- U.S. Patent No. 5,287,499, Nemes, Feb. 15, 1994.
- U.S. Patent No. 4,996,663, Nemes, Feb. 26, 1991.
- Christopher J. Van Wyk and Jeffrey Scott Vitter, The Complexity of Hashing with Lazy Deletion, Springer-Verlag New York, Algorithmica 1:17-29, 1986.

- John A. Morrison, Larry A. Shepp, and Christopher J. Van Wyk, A Queueing Analysis of Hashing with Lazy Deletion, Society for Industrial and Applied Mathematics, Vol. 16, No. 6:1155-1164, December 1987.
- Christopher J. Van Wyk, Data Structures and C Programs, Addison-Wesley Publ'g Co. & Bell Telephone Laboratories, Inc., 1988.
- Robert L. Kruse, *Data Structures and Program Design*, Second Edition, Prentice-Hall, Englewood Cliffs, New Jersey, 1987, pp. 198-215.
- “The Art of Computer Programming,” Volume 3, “Searching and Sorting,” by D.E. Knuth, Addison-Wesley, 1973, pp. 506-549.
- Daniel F. Stubbs and Neil W. Webre, *Data Structures with Abstract Data Types and Pascal*, Brooks/Cole Publishing Company, Monterey, California, 1985, pp. 310-336.
- Linux 1.3.52 - route.c, released on December 29, 1995 to the public.
- Linux 1.3.51 - route.c, released on December 27, 1995 to the public.
- Linux 2.0.1 - route.c, July 1996.
- gcache.c from Xinu Operating System for Sparc (1991) (hereinafter “gcache.c”) and Douglas Comer and Shawn Ostermann, GCache: A Generalized Caching Mechanism, Purdue University (Revised March 1992).
- Naval Research Laboratories IPv6 – key.c and key.h, 1995.

Dated: March 11, 2011

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on March 11, 2011.

Date: March 11, 2011

*/s/ Todd M. Briggs*