

**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, LLC, AOL LLC, AND §
CME GROUP INC., §
 §
Defendants. §

CASE NO. 6:09-CV-269-LED

Jury Trial Demanded

JOINT SUBMISSION OF JURY MATERIALS FOR SECOND TRIAL

Plaintiff Bedrock Computer Technologies LLC (“Plaintiff”) and Softlayer Technologies, Inc., Yahoo! Inc., MySpace, Inc., Amazon.com Inc., AOL Inc., and (“Defendants”), hereby submit the following jury materials:

Attached as Exhibit A hereto are the parties’ Joint Proposed Preliminary Jury Instructions, with bracketed and highlighted individual proposals.

Attached as Exhibit B hereto are the parties’ Joint Proposed Final Jury Instructions, with bracketed and highlighted individual proposals.

Attached as Exhibit C hereto is Plaintiff’s Proposed Verdict Form.

Attached as Exhibit D hereto is Defendants’ Proposed Verdict Form.

Attached as Exhibit E hereto is Plaintiff’s Proposed Instruction on Willfulness.

Attached as Exhibit F hereto is Plaintiff's Proposed Verdict Form on Willfulness.

The parties reserve the right to amend, supplement, or modify these proposed jury materials as the case proceeds toward the final pre-trial conference and trial, and as the parties continue to meet and confer regarding these materials. Additionally, the parties do not waive any objections to issues that are the subject of pending motions, including *Daubert* motions, motions to strike, motions for summary judgment, and motions *in limine*.

DATED: March 15, 2011.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies, on March 15, 2011, the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this notice was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

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