

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
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-00269

Hon. Leonard E. Davis

**JURY TRIAL DEMANDED**

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**GOOGLE INC.'s AMENDED TRIAL WITNESS LIST**

Google Inc. (“Google”), pursuant to the Court’s Docket Control Order entered in this case, files this Amended Trial Witness List for identification and categorization of trial witnesses.

At this time, Google identifies the following witnesses for trial:

	WITNESS	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
1.	Atkinson, Randal			√
2.	Bainter, Mark		√	
3.	Budhiraja, Neena		√	
4.	Bustamante, Mike			√
5.	Chavey, Laurent		√	
6.	Comer, Douglas			√
7.	Cowlishaw, Jason			√
8.	Cox, Alan			√
9.	Crosby, Scott			√
10.	D’Avanzo, Joseph		√	
11.	Daluvoy, Sunil		√	
12.	Dirks, Patrick			√
13.	Dye, Marshall	√		
14.	Elliott, Nikki			√
15.	Falk, James W.			√
16.	Ferraro, Alexis			√
17.	Garrod, David J.	√		
18.	Griffoen, James			√
19.	Herbert, Tom			√
20.	Jeffay, Kevin	√		
21.	Kenney, Mary			√
22.	Kuznetsov, Alexey	√ (by depo)		
23.	La Roche, Florian			√
24.	Lawhon, Jim			√
25.	Little, Brett			√
26.	Lloyd, Jeff			√
27.	Lotvin, Mikhail	√ (by depo)		

	WITNESS	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
28.	McDonald, Daniel		√ (by depo)	
29.	Menscher, Damian	√		
30.	Miller, David			√
31.	Miller, Edwin		√	
32.	Morrison, John			√
33.	Morton, Andrew Keith Paul	√		
34.	Nemes, Richard M.	√		
35.	Ostermann, Shawn		√ (by depo)	
36.	Peon, Roberto			√
37.	Periera, Lucas	√		
38.	Phan, Bao			√
39.	Sartin, Elizabeth			√
40.	Schiller, Jeffrey		√	
41.	Schultz, Eugene	√		
42.	Seth, Rohit			√
43.	Shepp, Larry			√
44.	Storie, Sally			√
45.	Szpankowski, Wojciech			√
46.	Szymanski, Thomas			√
47.	Talbott, Jim			√
48.	Tarjan, Robert			√
49.	Thatte, Satish			√
50.	Ugone, Keith	√		
51.	van Kempen, Fred N.			√
52.	van Wyk, Christopher		√ (by depo)	
53.	Vitter, Jeffrey			√
54.	Wallach, Dan		√	
55.	Waychison, Michael	√		
56.	Weimer, Florian			√
57.	Weir, Trisha	√		
58.	Weiss, Mark			√
59.	Any trial witness disclosed by Plaintiff		√	
60.	Any trial witness disclosed by any Defendant		√	
61.	Representative from		√ **	

	WITNESS	(A) WILL CALL	(B) MAY CALL	(C) MAY, BUT PROBABLY WILL NOT CALL
	Nationwide Mutual Insurance			
62.	Representative from SunGard		√ **	
63.	Representative from CME Group		√ **	
64.	Representative from R.L. Polk & Co.		√ **	
65.	Representative from ConAgra		√ **	
66.	Expert on factors considered and motivation for settlements in patent cases	√		

\*\* If the Court admits any settlement and license agreements between Bedrock and defendants Bedrock has sued in this or the co-pending related suit, Google reserves the right to have relevant witnesses from these companies testify on relevant damages-related subject matter.

Google incorporates by reference the witness list submitted by the plaintiff and reserves the right to supplement and revise this witness list as additional information becomes available. Google reserves the right to object to the admissibility of testimony by witnesses identified on Bedrock Computer Technologies, LLC's list of Trial Witnesses and reserves its right to move to exclude testimony. Google reserves the right to amend this list based on the outcome of pending *Daubert* motions and motions *in limine*.

If any of the identified witnesses are unwilling or unable to appear at trial, Google will present the witness's deposition testimony.

Dated: March 18, 2011

Respectfully submitted,

By: /s/ Evette D. Pennypacker  
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ATTORNEYS FOR GOOGLE INC. and  
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