

**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

JURY TRIAL DEMANDED

**DEFENDANTS' OBJECTIONS TO PLAINTIFF
BEDROCK COMPUTER TECHNOLOGIES, LLC PRE-TRIAL DISCLOSURES**

Pursuant to Paragraph 7 of the Court's Discovery Order and the Docket Control Order, Dkt. No. 556, Defendants Yahoo! Inc., Amazon.com Inc., SoftLayer Technologies, Inc., MySpace Inc., and AOL Inc., make the following objections to Plaintiff Bedrock Computer Technologies LLC's pre-trial disclosures. Exhibit A contains Defendants' objections to Bedrock's trial exhibits. Defendants' reserve all of their rights to make any additional objections to Bedrock's pre-trial disclosures.

Several of the exhibits identified on Bedrock's trial exhibit list are relevant to only one co-Defendant. Therefore, Defendants object to Bedrock's use of any document produced by, or relevant to, only one co-Defendant as an exhibit purporting to show evidence of another co-Defendants' infringement of the '120 patent or damages caused by infringement of the '120 patent. Defendants further reserve the right to object to Bedrock's trial exhibits on a Defendant by Defendant basis.

By making these objections to Bedrock's trial exhibit list, Defendants do not waive any right or argument associated with Defendants' pending motions in limine and pending motions to strike expert testimony.

Respectfully submitted, this the 18th day of March 2011.

/s/ E. Danielle T. Williams (with permission)

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