

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

BEDROCK COMPUTER
TECHNOLOGIES LLC,

Plaintiff,

v.

SOFTLAYER TECHNOLOGIES, INC.,
et al.,

Defendants.

CASE NO. 6:09-CV-00269

JURY TRIAL DEMANDED

DEFENDANTS' MOTION TO REDACT TRANSCRIPT

COMES NOW, Defendants Softlayer Technologies, Inc., Amazon.com, Inc., Google Inc. Yahoo! Inc., Myspace Inc., and AOL Inc. ("Defendants") files their Motion to Redact Transcript, and in support thereof, would respectfully show the Court the following:

A Motions Hearing was held in this case on March 17, 2011. During the hearing, certain matters were discussed that are confidential and subject to the Protective Order entered in this case. A transcript of the Motions Hearing was prepared by Mr. D. Keith Johnson.

Due to the confidential nature of some of the material contained in the transcript, Defendants request the following specific redactions:

1. Page 26, lines 14-15 ending after "case."
2. Page 27, lines 3-25 beginning with "The"
3. Page 28, lines 5-8 beginning with "he does"
4. Page 64, line 21 number identifier after "records," and before "server"
5. Page 68, line 5-6 after "these" and before "damage"

6. Page 68, line 13 after "are" through end of sentence
7. Page 68, line 19
8. Page 69, lines 6-9 starting at the beginning of line 6 and ending on line 9 after
"there"
9. Page 69, lines 13-14 starting on line 13 at "They" and ending on line 14 at "out"
10. Page 69, lines 21-25 starting at "And it"
11. Page 70, line 1 through Page 71, line 1
12. Page 73, lines 11-14 ending on line 14 after "small,"
13. Page 73, lines 24-25 starting on line 24 at "and" and ending on line 25 after
"Court,"
14. Page 75, lines 5-8 ending on line 8 after "internet."
15. Page 75, lines 10-19 ending on line 19 after "does."
16. Page 75, lines 24-25 beginning on line 24 at "As"
17. Page 76, lines 1-2
18. Page 76, lines 6-7 beginning on line 6 at "Just"
19. Page 76, lines 9-11 ending on line 11 after "threshold."
20. Page 76, line 20 - Page 77, line 4
21. Page 77 lines 5-19 beginning on line 5 at "they"
22. Page 78, lines 8-13 beginning on line 8 after "there" and ending on line 13 after
"addresses."
23. Page 94, line 14 ending after "built"
24. Page 96, lines 14-17 beginning on line 14 at "During"
25. Page 99, lines 7-9 beginning on line 7 at "for example," and ending on line 9 after

"second."

26. Page 100, line 25 through Page 101, line 1 beginning on Page 100, line 25 at

"more"

27. Page 101, lines 14-17 ending on line 17 after "four."
28. Page 101, line 19 number identifier after "is"
29. Page 101, line 20 number identifier after "is"
30. Page 103, lines 2-3 beginning on line 2 after "today."
31. Page 103, lines 15-18 beginning on line 15 with "For example,"
32. Page 106, lines 17 through Page 107, line 2
33. Page 107, lines 16-18 beginning on line 16 at "Well,"
34. Page 116, line 13 after "seeking" ending before "for"
35. Page 117, line 1 after "for" ending before "last"
36. Page 117, line 22 number identifiers before "a" in each instance
37. Page 125, line 17-18 number identifiers after "for" on line 17 and before "on" on

line 18

38. Page 125, lines 19-25 beginning on line 19 after "minute," and ending on line 25

before "That's"

39. Page 126, line 4 after "it's and before "for"
40. Page 126, line 16 after "was" and before "But"
41. Page 126, line 20 after "from" and before "per"
42. Page 126, line 21 number identifier before "per"
43. Page 127, line 9 beginning after "for" and ending before "And"
44. Page 127, line 21 beginning after "has" and ending before "U.S."

45. Page 128, line 3 number identifier before "per"
46. Page 128 line 20 beginning after "get"
47. Page 128, line 21 beginning after "Well," and ending before "doesn't"
48. Page 130, line 2 number identifiers after "your" and after "to"
49. Page 138, number identifier before "The"
50. Page 139, number identifier after "the" and before "party"

Defendants respectfully request that this Court grant its Motion to Redact Transcript.

Dated: April 27, 2011

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel on behalf of Defendants, Danielle Williams, met and conferred with counsel for Plaintiff, Chris Bunt, regarding Plaintiff's position on this motion via telephone. Plaintiff is presently opposed to the relief sought in this motion. However, counsel for Plaintiff advised that he will review the issue with lead counsel who is presently in trial and further advise the Court of Plaintiff's position, if necessary.

/s/ E. Danielle T. Williams

E. Danielle T. Williams

CERTIFICATE OF SERVICE

The undersigned hereby certifies that all counsel of record who are deemed to 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 April 27, 2011. Any other counsel of record will be served by First Class U.S. mail on this same date.

/s/ E. Danielle T. Williams

E. Danielle T. Williams