

EXHIBIT 15

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

BEDROCK COMPUTER)
TECHNOLOGIES LLC)

DOCKET NO. 6:09cv269

-vs-)

Tyler, Texas
1:10 p.m.

YAHOO!, INC.)

April 29, 2011

TRANSCRIPT OF TRIAL
AFTERNOON SESSION
BEFORE THE HONORABLE LEONARD DAVIS,
UNITED STATES DISTRICT JUDGE

A P P E A R A N C E S

FOR THE PLAINTIFF:

MR. DOUGLAS A. CAWLEY
MR. THEODORE STEVENSON, III
MR. SCOTT W. HEJNY
MR. JASON D. CASSADY
McKOOL SMITH
300 Crescent Court, Ste. 500
Dallas, TX 75201

MR. ROBERT M. PARKER
MR. ROBERT CHRISTOPHER BUNT
PARKER, BUNT & AINSWORTH
100 E. Ferguson, Ste. 1114
Tyler, TX 75702

COURT REPORTERS:

MS. JUDY WERLINGER
MS. SHEA SLOAN

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produced by a Computer.

1 QUESTION: Now, Mr. Kuznetsov, isn't it
2 true, sir, that the Defendant's position can be
3 difficult to defend, and you believe that they should
4 seek an expert in loopholes of patent rules?

5 ANSWER: Yes. I wrote that as well --
6 no, actually, the situation was the following: When
7 Alton Absher contacted me at the first contact, I didn't
8 remember exactly about -- about my communication with
9 Nathan Day from Softlayer, Inc. I didn't remember
10 details.

11 So I -- I took the version of kernel
12 dated by 1997, right before the patent -- the patent was
13 filed, the last kernel version before the patent was
14 filed. I looked to the source and found out that this
15 code actually doesn't collide with the patent -- does
16 not -- does not collide with the patent. That's what I
17 wrote there.

18 But, for a minute, I actually forgot
19 about that older code. I remembered about it only after
20 I read the mail from the communication with Nathan Day
21 dated a year ago. When I read it, I saw that actually I
22 told him that I have code dated by 1995, which directly
23 invalidates the patent.

24 QUESTION: Is it true, sir, that you
25 wrote to Mr. Absher stating the position can be