

EXHIBIT 18

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, and)
AOL LLC,)
)
Defendants.)
)

Case No. 6:09-CV-00269

**YAHOO! INC.'S FIRST SET OF INTERROGATORIES TO PLAINTIFF BEDROCK
COMPUTER TECHNOLOGIES LLC**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Defendant Yahoo! Inc. (“Yahoo!”) hereby requests that Bedrock Computer Technologies LLC (“Bedrock”) answer the following interrogatories within thirty days of service.

DEFINITIONS AND INSTRUCTIONS

1. “Bedrock,” “Plaintiff,” “You,” and/or “Your,” shall mean Plaintiff Bedrock Computer Technologies LLC, as well as to all predecessors, successors, subsidiaries, divisions, parents and/or affiliates thereof, past or present, and all past or present officers, directors, affiliates, agents, employees, consultants, representatives and any other person acting on its behalf, including but not limited to Richard M. Nemes.

2. “Defendants” shall mean Yahoo! Inc., Softlayer Technologies, Inc., Citiware

Technology Solutions, LLC, Google Inc., MySpace Inc., Amazon.com Inc., Paypal Inc., Match.com, LLC, or AOL LLC

3. The term “each” shall mean each and every.
4. The term “any” shall include the word all, and vice versa.
5. The term “and,” “or,” and “and/or” shall be construed in the conjunctive or the disjunctive, whichever makes the interrogatory more inclusive.
6. The use of the singular shall be deemed to include the plural, and the use of one gender shall include the other as are appropriate in the context.
7. “Describe in detail” means that you are requested to state and describe, with specificity, each and every fact, ultimate fact, circumstance, incident, act, omission, event, date, and/or legal contention pertaining to the matter(s) inquired of in said interrogatory.
8. “’120 Patent” shall mean U.S. Patent No. 5,893,120.
9. “Infringe” or any variant thereof shall mean any infringement whether direct, contributory, or by inducement.
10. The term “asserted claim(s)” shall mean the claims of the ’120 Patent which Bedrock asserts are infringed by Yahoo! as set forth in Bedrock’s P.R. 3-1 Disclosures and Preliminary Infringement Contentions.
11. The term “relating to” shall mean pertaining to, concerning, referring to, describing, discussing, reflecting, evidencing, constitution, supporting, contradicting or resulting from matter specified.
12. A request for “identification,” to “identify” or to “state the identity of” requires the following information:
 - a. When used with respect to an entity, provide the full name; present or last

known address; date, state and country of incorporation or organization; the name under which it was organized; the name of the chief executive officer or person holding a comparable position; and the identity of all natural persons within the entity having knowledge of the subject matter with respect to which the entity is being identified in an interrogatory answer.

b. When used with respect to a natural person, provide the full name, present or last known address, present or last known telephone number; and where applicable, present or last known employer or address, and present or last known job, position, or title of that individual.

c. When used with respect to a document, provide the date of preparation and, if different, the date of the document itself; each author; each addressee and copy recipient; the number of pages, the type of document (for example, a letter, memorandum or notes); and the name of the person who has possession, custody or control of the document, if different from yourself.

d. When used with respect to facts, provide the evidentiary basis for the fact, including, if a document, the specific information required by 12.c above, and if a person, the specific information required by 12.b above.

e. When used with respect to a communication, provide the date of the communication, identify the person who initiated the communication; identify each person who received such communication; identify the form of the communication (*e.g.*, oral or written); the identity of any documents which embody the communication, and a general description of the content of the communication.

13. In the event any information is withheld on a claim of attorney-client privilege, attorney work-product immunity, or any other privilege from disclosure, please provide

sufficient detail regarding the nature of the information, its source, the general subject matter, and the names and addresses of all persons to whom that information was disclosed, and a statement of the grounds for refusal to answer such interrogatory, such as would enable other parties to assess the applicability of the privilege or protection.

14. If you cannot respond on an interrogatory fully, after a diligent attempt to obtain the requested information, answer the interrogatory to the extent possible, specifying which portion you are unable to answer, and provide whatever information you have regarding the unanswered portion.

15. If you object to any part of an interrogatory and refuse to answer that part, state your objection and answer the remaining portion of that interrogatory. If you object to the scope or time period of an interrogatory and refuse to answer for that scope or time period, state your objections and answer the interrogatory for the scope or time period you believe is appropriate (including in your answer to a specific statement as to why you believe the scope or time period is inappropriate).

16. The following interrogatories are continuing in character and Bedrock's responses are to be supplemented in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

INTERROGATORIES

INTERROGATORY NO. 1:

For each Defendant, describe in detail the type of damages sought as a result of alleged infringement of the asserted claims of the '120 patent (*e.g.*, lost profits, reasonable royalty or both) and the complete legal and factual bases (*e.g.*, including any calculations under the entire market value rule, any theory relating to convoyed sales, and the date(s) upon which Bedrock contends that hypothetical negotiation(s) would have taken place with each Defendant) for the

calculation of any such damages.

INTERROGATORY NO. 2:

For each Defendant, describe in detail all facts concerning any alleged damage or injury that Bedrock contends it will suffer if each Defendant is allowed to continue making, developing, using, marketing, importing, selling, or offering for sale any allegedly infringing product and/or service.

Dated: March 2, 2010

Yar R. Chaikovsky

Yar R. Chaikovsky

Cal. Bar No. 175421

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ATTORNEY FOR DEFENDANT

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MPK 161019-4.049256.0026

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of

**YAHOO! INC.'S FIRST SET OF INTERROGATORIES TO PLAINTIFF BEDROCK
COMPUTER TECHNOLOGIES LLC**

has been served upon all counsel of record identified below on March 2, 2010 via electronic mail
as agreed to by the parties.

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/s/ Nikole Faasisila

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