

EXHIBIT 20

**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.

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CASE NO. 6:09-cv-269-LED

Jury Trial Demanded

**PLAINTIFF’S RULE 30(B)(6) DEPOSITION
NOTICE TO DEFENDANT YAHOO! INC.**

To: Defendant, Yahoo! Inc., by and through its attorney of record, Yar R. Chaikovsky, MCDERMOTT WILL & EMERY LLP, 275 Middlefield Road, Suite 100, Menlo Park, California 94025.

In accordance with Federal Rule of Civil Procedure 30(b)(6), please take notice that Plaintiff Bedrock Computer Technologies LLC (“Plaintiff” or “Bedrock”), by and through its counsel, will take the oral deposition of Defendant Yahoo! Inc. (“Defendant” or “Yahoo!”), commencing August 31, 2010, at 9:00 a.m., and continuing from day to day until completed, at the offices of McKool Smith P.C., 300 Crescent Court, Suite 1500, Dallas, Texas 75201 or such other location, date, and time mutually agreed upon by the parties.

The deposition will be conducted before an officer authorized to administer oaths. The deposition will be recorded stenographically and will be videotaped.

Bedrock will examine Yahoo!’s representative on the matters in the numbered paragraphs set forth below in **Schedule A**. In accordance with Federal Rule of Civil Procedure 30(b)(6), Yahoo! is to designate one or more persons to testify on Yahoo!’s behalf with respect to the matters described in **Schedule A** and set forth, for each individual designated, the matters on which the individual will testify, no later than five (5) business days before the depositions.

Date: July 14, 2010.

Respectfully submitted,

/s/ Jason D. Cassady

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**ATTORNEYS FOR PLAINTIFF
BEDROCK COMPUTER
TECHNOLOGIES LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that, on July 14, 2010, the foregoing document was served on counsel of record via Electronic Mail.

/s/ Jason D. Cassady
Jason D. Cassady

SCHEDULE A

Definitions

1. “Yahoo!,” “Defendant,” “you,” and “your” means Defendant Yahoo! Inc., and any past or present predecessor, successor, parent, subsidiary, division or affiliate thereto, and all persons (defined below) acting on their behalf including, without limitation, present and former officers, directors, employees, attorneys, agents, and representatives thereof.

2. “Bedrock” means Plaintiff Bedrock Computer Technologies LLC, and their subsidiaries, divisions, affiliates, present and former officers and directors, employees, agents, and all of those persons (defined below) acting on their behalf.

3. “Person” means any natural person, corporation, or other business, legal or governmental entity or association, as well as all officers, directors, employees, agents, and attorneys thereof.

4. The term “any” or “each” should be understood to include and encompass “all.”

5. The terms “and,” “or” and “and/or” shall be construed either conjunctively or disjunctively so as to include the broadest meaning possible.

6. The term “120 patent” or “patent-in-suit” refers to United States Patent No. 5,893,120, entitled “Methods and Apparatus for Information Storage and Retrieval Using a Hashing Technique with External Chaining and On-the-Fly Removal of Expired Data.”

7. “Accused Version of Linux” means the following Linux kernel versions or software based on the following Linux kernel versions: 2.4.22.x, 2.4.23.x, 2.4.24.x, 2.4.25.x, 2.4.26.x, 2.4.27.x, 2.4.28.x, 2.4.29.x, 2.4.30.x, 2.4.31.x, 2.4.32.x, 2.4.33.x, 2.4.37.x, 2.6.0.x, 2.6.1.x, 2.6.2.x, 2.6.3.x, 2.6.4.x, 2.6.5.x, 2.6.6.x, 2.6.7.x, 2.6.8.x, 2.6.9.x, 2.6.10.x, 2.6.11.x, 2.6.12.x, 2.6.13.x, 2.6.14.x, 2.6.15.x, 2.6.16.x, 2.6.17.x, 2.6.18.x, 2.6.19.x, 2.6.20.x, 2.6.21.x,

2.6.22.x, 2.6.23.x, 2.6.24.x, 2.6.25.x, 2.6.26.x, 2.6.27.x, 2.6.28.x, 2.6.29.x, 2.6.30.x, 2.6.31.x, or versions beyond 2.6.31.x.

8. The term “related to” mean anything that constitutes, contains, evidences, embodies, comprises, reflects, identifies, states, refers to, deals with, comments on, responds to, describes, analyzes or is, in any way, relevant to that subject.

Topics

1. The design, use, function, operation, structure, code, dimensions, manufacturing, and processing specifications of any server or network of servers executing any Accused Version of Linux since 2003.

2. The design, use, function, operation, structure, code, dimensions, manufacturing, and processing specifications of any server or network of servers executing any version of Linux other than an Accused Version of Linux since 2003.

3. The identity of all persons involved in the design, use, function, operation, structure, code, dimensions, manufacturing, and processing specifications of any server or network of servers executing any Accused Version of Linux since 2003.

4. The identification and location of any server or network of servers executing any Accused Version of Linux since 2003.

5. The facts and circumstances surrounding any design changes, considered and/or implemented, to any server or network of servers executing any Accused Version of Linux.

6. All technical considerations made as part of any decision to use or not use any Accused Version of Linux.

7. The identification of all technologies, including hardware and/or software that you have implemented to address denial of service attacks and/or server downtime.

8. The identification of all technologies, including hardware and/or software that you have implemented where the decision to implement included any consideration of denial of service attacks and/or server downtime.

9. The identification of all technologies, including hardware and/or software, that you have considered for but decided against implementation where the decision to implement included any consideration of denial of service attacks and/or server downtime.

10. All people, technical considerations, and cost considerations involving each and every identified technology in topics 6 through 9.

11. The identity of any instance in which you considered employing an asserted prior art system instead of or as a replacement for your use of an Accused Version of Linux.

12. The identity of any instance in which you considered implementing the teachings of an asserted prior art reference instead of or as a replacement for your use of an Accused Version of Linux.

13. All people, technical considerations, and cost considerations involving each and every identified instance in topics 11 and 12.

14. Your protocol for recovering from a successful denial of service attack on your servers.

15. Any instances in which you have been the target of a denial of service attack, and for each instance: (i) the success of the denial of service attack; (ii) how the denial of service attack was recognized; (iii) the effects of the denial of service attack; (iv) how you overcame the denial of service attack; and (v) any estimated cost in terms of dollars of the denial of service attack.

16. Any and all activities that require server downtime, including any costs associated with that downtime.

17. The identity, content, and context of any communications, written or oral, between the Defendant and any third-parties (by production number, if produced) regarding

infringement, validity, and/or enforceability of the patent-in-suit. This includes the identification and location of third-parties and specific individuals with whom such communications were had.

18. The identification and location (including address), of any alleged prior art apparatus/device that Defendant contends constitutes prior art to one or more of the asserted claims of the patent-in-suit, and the identification and authentication of all documents that evidence that purportedly supports your contention.

19. Defendant's first awareness of Bedrock and/or the patent-in-suit and the circumstances surrounding same, and the identification of documents and materials (by production number, if produced) that describe or set forth such information.

20. The Defendant's responses to Plaintiff's interrogatories #3, #5, and #6.

21. The factual and legal bases that support Defendant's affirmative defense that Plaintiff has failed to state a claim upon which relief can be granted, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.

22. The factual and legal bases that support Defendant's affirmative defense that Defendant does not infringe and has not infringed, either directly, indirectly, jointly, contributorily, by inducement, or in any other way, any claim of the '120 patent, either literally or under the doctrine of equivalents, willfully or otherwise, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.

23. The factual and legal bases that support Defendant's affirmative defense that one or more claims of the '120 patent are invalid, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.

24. The factual and legal bases that support Defendant's affirmative defense that Plaintiff's claims are barred by the equitable doctrines of laches, unclean hands, estoppel, and/or

waiver, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.

25. The factual and legal bases that support Defendant's affirmative defense that Plaintiff's claims for damages are limited under 35 U.S.C. § 286 and/or 35 U.S.C. § 287, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.

26. The factual and legal bases that support Defendant's affirmative defense that Plaintiff's claim for injunctive relief is barred, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.

27. The factual and legal bases that support Defendant's affirmative defense that Plaintiff lacks standing and/or ownership to bring suit against Defendant on the '120 patent, and has failed to name an indispensable party, as well as the identity and location of all witnesses with relevant knowledge regarding this affirmative defense.