EXHIBIT 4

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

BEDROCK COMPUTER TECHNOLOGIES LLC,	§ § §	
Plaintiff,	§ §	
	§	CASE NO. 6:09-cv-269-LED
v.	§ §	Jury Trial Demanded
SOFTLAYER TECHNOLOGIES, INC., et al.	§ § §	
	§	
Defendants.	§	

PLAINTIFF BEDROCK COMPUTER TECHNOLOGIES LLC'S
OBJECTIONS AND RESPONSES TO YAHOO! INC.'S
SECOND SET OF REQUESTS FOR ADMISSIONS TO PLAINTIFF

Pursuant to Rule 36 of the Federal Rules of Civil Procedure and the Local Rules of the

United States District Court for the Eastern District of Texas, Plaintiff Bedrock Computer

Technologies LLC ("Bedrock") serves its responses to Yahoo! Inc.'s ("Yahoo!") Second Set of

Requests for Admissions ("Requests").

Bedrock makes the objections and responses herein (collectively, the "Responses") based

solely on its current knowledge, understanding, and belief as to the facts and the information

available to it as of the date of the Responses. Additional discovery and investigation may lead

to additions to, changes in, or modifications of these Responses. The Responses, therefore, are

being given without prejudice to Bedrock's right to produce subsequently discovered

information and to introduce such subsequently discovered information at the time of any

hearing or trial in this action.

GENERAL OBJECTIONS

The following general objections apply to, and are incorporated by reference in, every response to each request for admission. Bedrock's specific objections to Yahoo!'s requests are not intended to preclude, override or withdraw any of the general objections to that request.

1.   Bedrock objects to all definitions, instructions and requests to the extent they attempt to impose obligations extending beyond those imposed or authorized by the Federal Rules of Civil Procedure and Local Rules.

2.   Bedrock objects to the Requests to the extent that they call for information protected by the attorney-client privilege, work product doctrine, or any other privilege or protection afforded by state or federal law. Bedrock will provide only responsive information that is not subject to any such privilege or protection.

3.   Bedrock objects to the Requests to the extent that they call for information that is not known by or available to Bedrock.

4.   Bedrock objects to the Requests to the extent that they seek information that is a matter of public record or is equally available or readily ascertainable by Yahoo! from some other source.

5.   Bedrock objects to the Requests to the extent that they are unreasonably cumulative, redundant, or duplicative of other Requests, or seek information that is obtainable from some other source that is more convenient, less burdensome, or less expensive.

6.   Bedrock objects to the Requests on the grounds that they are unduly burdensome and duplicative to the extent that they request information that Bedrock is already obligated to provide under the Federal Rules and Local Rules. To the extent that the Requests seek such information, Bedrock will produce the information in accordance with the Court's Docket Control and Discovery Orders and the schedule agreed upon by the parties.

7.   Bedrock objects to all definitions, instructions and requests to the extent they contain subparts, are compound and conjunctive and are otherwise inconsistent with Rule 36 of the Federal Rules of Civil Procedure.

8.   Bedrock objects to the Requests to the extent that they seek information that is neither relevant to any claim or defense of any party in this action, nor reasonably calculated to lead to the discovery of admissible evidence.

9.   Bedrock objects to the Requests to the extent that they are overly broad, unduly burdensome or oppressive, and to the extent that they are vague and ambiguous or fail to describe the information sought with the required reasonable particularity.

10.   Bedrock objects to the Requests to the extent that they seek to impose upon Bedrock an obligation to investigate or discover information, materials or documents from third parties or services that are not within the possession custody or control of Bedrock, regardless of whether such information, materials or documents are equally accessible to Bedrock.

11.   Bedrock objects to the Requests to the extent they seek disclosure of trade secrets and other confidential research, development or commercial information, and adequate protection cannot be afforded by means of a protective order.

12.   Bedrock's agreement to furnish information in response to Yahoo's Requests shall not be deemed to constitute an admission as to their relevancy, nor is it intended to waive any right to object to its admissibility at trial.

13.   Bedrock incorporates the objections stated above into each and every response as though fully set forth therein.

REQUEST FOR ADMISSION NO. 19

Admit that Bedrock did not inform Yahoo! of the '120 patent before filing this lawsuit.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock ADMITS Request No. 19.

REQUEST FOR ADMISSION NO. 20

Admit that the '120 Patent does not disclose that box 42 of Figure 3 occurs at any time other than during the same traversal of a linked list in which expired records are identified as depicted in Figure 3.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock ADMITS that box 42 of Figure 3 of the '120 Patent occurs during the same traversal of a linked list in which expired records are identified. Bedrock DENIES the remainder of Request No. 20.

REQUEST FOR ADMISSION NO. 21

Admit that the '120 Patent does not disclose that the "remove" function in the Search Table Procedure occurs at any time other than during the same traversal of a linked list in which expired records are identified.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock DENIES Request 21.

REQUEST FOR ADMISSION NO. 22

Admit that the '120 Patent does not disclose that the "remove" function in the Alternate Version of Search Table Procedure occurs at any time other than during the same traversal of a linked list in which expired records are identified.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock DENIES Request No. 22.

REQUEST FOR ADMISSION NO. 23

Admit that Linux Kernel versions prior to version 2.6.25 do not have the structure of Figure 3 of the '120 Patent.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock DENIES Request No. 23.

REQUEST FOR ADMISSION NO. 24

Admit that Linux Kernel versions prior to version 2.6.25 do not have the structure of the Search Table Procedure of the '120 Patent.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock DENIES Request No. 24.

REQUEST FOR ADMISSION NO. 25

Admit that Linux Kernel versions prior to version 2.6.25 do not have the structure of the

Alternate Version of Search Table Procedure of the '120 Patent.

RESPONSE:

Subject to the foregoing general objections, Bedrock responds as follows:

Bedrock DENIES Request No. 25.

Date: January 12, 2011.

Respectfully submitted,

/s/ Jason D. Cassady

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**ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served on counsel of record via email on January 12, 2011.

 /s/ Jason D. Cassady
Jason D. Cassady