

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

I/P ENGINE, INC. Plaintiff,

v.

AOL, INC., *et al.*, Defendants.

Civil Action No. 2:11-cv-512

**DEFENDANTS' MOTION FOR LEAVE TO SUBMIT EVIDENCE AND OFFER OF
PROOF IN SUPPORT OF DEFENDANTS' OPENING BRIEF ON ISSUES RAISED IN
THE COURT'S AUGUST 14 ORDER**

Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., AOL, Inc., and Gannett Co., Inc., by their counsel, respectfully move this Court for an order granting leave to submit evidence and offer of proof in support of Defendants' Opening Brief on issues raised in the Court's August 14, 2013 Order. The grounds and authorities in support of this motion are set forth in the accompanying Brief in Support of Defendants' Motion, the Declaration of Howard Chen in Support of Defendants' Motion and the associated exhibits, and the Declaration of Kristan B. Burch in Support of Defendants' Motion.

DATED: October 30, 2013

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CERTIFICATE OF SERVICE

I hereby certify that, on October 30, 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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