

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 FILE RESPONSE TO PLAINTIFF I/P  
ENGINE, INC.'S SUPPLEMENTAL MEMORANDUM SETTING FORTH  
ADDITIONAL NEW FACTS JUSTIFYING ITS REQUEST FOR DEFAULT  
JUDGMENT IN I/P ENGINE'S MOTION FOR DEFENDANTS TO SHOW CAUSE  
UNDER RULE 37 FOR NONCOMPLIANCE WITH THE AUGUST 13, 2013 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 respond to Plaintiff's October 31, 2013 supplemental memorandum setting forth additional new facts. The grounds and authorities in support of this motion are set forth in the accompanying Brief in Support of Defendants' Motion and Exhibit A thereto. Attached as Exhibit 1 is a proposed order granting this motion.

DATED: November 5, 2013

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**CERTIFICATE OF SERVICE**

I hereby certify that, on November 5, 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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