

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

_____)	
I/P ENGINE, INC.,)	
)	
	Plaintiff,)	
v.)	Civil Action No. 2:11-cv-512
)	
AOL, INC. et al.,)	
)	
	Defendants.)	
_____)	

**I/P ENGINE, INC.’S SUBMISSION OF UNAFFILIATED EXPERTS
CAPABLE OF DETERMINING WHETHER GOOGLE’S RE-DESIGN
OF ITS INFRINGING SYSTEM IS NO MORE THAN A COLORABLE VARIATION
OF THE ADJUDGED INFRINGING SYSTEM**

I/P Engine respectfully submits the names of the following two unaffiliated experts:

- James Allan (CV attached as Exhibit A), and
- John F. Elder IV, Ph.D. (CV attached as Exhibit B).

I/P Engine conducted due diligence of these two proposed experts. A third party search firm confirmed the availability of the two proposed experts, but did not disclose the facts of this case or the party that was inquiring about their availability. I/P Engine’s understanding is that the search firm merely presented the proposed experts with the parties involved in this case and the fact that this Court is looking for a potential court-appointed expert.

Dated: November 15, 2013

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CERTIFICATE OF SERVICE

I certify that on this 15th day of November 2013 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification to the following:

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