

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

I/P ENGINE, INC.,

Plaintiff,

v.

Civil Action No. 2:11cv512 (RAJ-FBS)

AOL INC., GOOGLE, INC.,
IAC SEARCH & MEDIA, INC.,
GANNETT CO., INC. and
TARGET CORPORATION

Defendants.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO
PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH THIS COURT'S
SCHEDULING ORDER, OR ALTERNATIVELY, MOTION FOR PROTECTIVE
ORDER, AND MEMORANDUM IN SUPPORT OF SAME**

The Defendants AOL Inc. ("AOL"), IAC Search & Media, Inc. ("IAC Search & Media"), Gannett Co., Inc. ("Gannett"), Target Corporation ("Target"), and Google Inc. ("Google") (collectively "Defendants"), by counsel, pursuant to Rule 7 of the Local Rules of Practice for the United States District Court for the Eastern District of Virginia, move this Court for entry of an order granting the Defendants an extension of time through and including April 9, 2012, in which to file their Response to Plaintiff's Motion to Compel Compliance With the Court's Scheduling Order ("Motion to Compel"), and in support thereof state as follows:

1. Plaintiff filed its Motion to Compel on March 21, 2012. Under Local Rule 7 and Fed. R. Civ. P. 6, Defendants' response is due on April 5, 2012.
2. The Defendants have requested, and the plaintiff has agreed to, an extension through and including April 9, 2012, to file their response to the Plaintiff's Motion to Compel.

3. Granting an extension through and including April 9, 2012, to file their response to the Plaintiff's Motion to Compel will not prejudice the plaintiff and will facilitate a more complete and efficient discovery process.

4. Attached as **Exhibit 1** is a proposed agreed order granting the Defendants through and including April 9, 2012 to file their response to the Plaintiff's Motion to Compel. The parties are circulating a copy of this agreed order and will deliver it to the Court for entry once endorsed.

WHEREFORE, the Defendants, by counsel, request that this Court enter the proposed agreed order attached as **Exhibit 1** granting the Defendants through and including April 9, 2012 to file their response to the Plaintiff's Motion to Compel.

Dated: April 5, 2012

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2012, 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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