

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 STAY OF REQUIREMENT THAT  
DEFENDANTS PROVIDE REVENUE INFORMATION AND CALCULATIONS  
OF ONGOING ROYALTY PAYMENTS**

The Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., Gannett Co., Inc. and AOL Inc. (collectively "Defendants"), respectfully request that this Court stay its August 14, 2013 Order requiring Defendants "to certify by penalty of perjury the U.S. revenue attributable to Defendant's use of AdWords in U.S. Dollars and the calculation of the royalty payment" (D.N. 963, 6.) until the Federal Circuit has ruled on all pending appeals. (*See* Appeal Nos. 2013-1307, 2013-1313 (Fed. Cir.); Appeal Nos. 2014-1233, 2014-1289 (Fed. Cir.).

The grounds and authorities in support of this Motion are set forth in the accompanying Brief In Support of Defendants' Motion for Stay of Requirement that Defendants Provide Revenue Information and Calculations of Ongoing Royalty Payments. A proposed order is attached as **Exhibit 1**.

DATED: March 27, 2014

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**CERTIFICATE OF CONSULTATION**

I certify that counsel conferred in good faith to resolve this dispute prior to the filing of the present Motion for Stay of Requirement that Defendants Provide Revenue Information and Calculations of Ongoing Royalty Payments.

/s/ Stephen E. Noona  
Stephen E. Noona

**CERTIFICATE OF SERVICE**

I hereby certify that on March 27, 2014, 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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