

**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

**STIPULATION**

Counsel for Plaintiff I/P Engine, Inc. (“I/P Engine”) and Counsel for Defendants AOL Inc., Google Inc., IAC Search & Media, Inc., Target Corporation, and Gannett Co., Inc. (collectively “Defendants”) stipulate to the following:

1. In its Orders of August 14, 2013, January 21, 2014, and January 28, 2014, this Court awarded ongoing royalties against Defendants (the “Ongoing Royalty Award”). (Docket Nos. 963, 1086 and 1088.)
2. The parties have agreed to stay any proceeding to execute or enforce the payment obligations of this judgment against Defendants for the Ongoing Royalty Award pending resolution of the related pending appeals (Appeal Nos. 13-1307, 13-1313 and 14-1233, 14-1289), and for thirty (30) days thereafter.
3. This Stipulation does not and shall not represent any agreement by I/P Engine to Defendants' requested stay of any requirement that Defendants provide revenue information and

calculations of ongoing royalty payments pending the appeals in this case (D.I. 1092), a stay that I/P Engine opposes.

4. The parties have also agreed that a supersedeas bond is not necessary to protect I/P Engine's interests pending Defendants' appeal of this case.

5. Consistent with Local Rule 62(B) for the United States District Court for the Eastern District of Virginia, the requirement of the posting of a supersedeas bond pending Defendants' appeal of this case is waived.

6. This stipulation will terminate thirty (30) days after service of the issuance of a mandate from the United States Court of Appeal for the Federal Circuit, unless Defendants post a supersedeas bond in an amount sufficient to cover the Ongoing Royalties Award amounts that remain after appeal.

7. Because Google is indemnifying the other Defendants for the Ongoing Royalties Award, Google will satisfy in full any Ongoing Royalties Award amounts that remain after appeal against all Defendants.

8. This Stipulation represents the entire agreement of the parties to this action regarding the matters set forth herein.

So stipulated:

Dated: April 11, 2014

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*Counsel for Defendants AOL Inc., Google Inc., IAC  
Search and Media, Inc., Target Corporation and  
Gannett Company, Inc.*

DATED: April \_\_\_\_\_, 2014

SO ORDERED:

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Honorable Raymond A. Jackson