

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.

**MOTION FOR EXTENSION OF TIME FOR TARGET CORPORATION  
TO FILE RESPONSIVE PLEADINGS TO COMPLAINT**

The defendant Target Corporation (“Target”), by counsel, moves this Court for an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint filed by I/P Engine, Inc. (“I/P Engine”), and in support thereof states as follows:

1. On September 15, 2011, I/P Engine filed its Complaint for patent infringement against Target. On September 23, 2011, I/P Engine served its Complaint upon Target.
2. Target’s responsive pleadings are not due until October 14, 2011.
3. Target has requested and I/P Engine has agreed to allow Target an extension of time through November 14, 2011, for Target to answer, plead, or otherwise respond to the Complaint filed by I/P Engine.
4. Attached as **Exhibit A** is a proposed agreed order granting Target an extension of time through November 14, 2011, to answer, plead or otherwise respond to the Complaint filed

by I/P Engine. The proposed agreed order is being circulated for endorsement and will be delivered to the Court once it is fully signed.

WHEREFORE, Target, by counsel, requests that this Court enter the attached proposed agreed order granting Target an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint.

Dated: October 10, 2011

Respectfully submitted,

/s/ Stephen E. Noona  
Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
[senoona@kaufcan.com](mailto:senoona@kaufcan.com)

*Counsel for Target Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 10, 2011, 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:

Jeffrey K. Sherwood  
Kenneth W. Brothers  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street NW  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201  
[sherwoodj@dicksteinshapiro.com](mailto:sherwoodj@dicksteinshapiro.com)  
[brothersk@dicksteinshapiro.com](mailto:brothersk@dicksteinshapiro.com)

*Counsel for Plaintiff, I/P Engine, Inc.*

Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 W. Main Street, Suite 2100  
Norfolk, VA 23510-1665  
Telephone: (757) 624-3239  
Facsimile: (757) 624-3169  
[senoona@kaufcan.com](mailto:senoona@kaufcan.com)

*Counsel for AOL Inc., Google, Inc.  
and Gannett Co., Inc.*

/s/ Stephen E. Noona  
Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
[senoona@kaufcan.com](mailto:senoona@kaufcan.com)

*Counsel for Target Corporation*