

**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

[PROPOSED] ORDER ON CLAIM CONSTRUCTION HEARING

The Court has scheduled a claim construction hearing in the above-captioned case for June 4, 2012 at 10:00 a.m.

[PLAINTIFF'S PROPOSAL]

The hearing shall last for no more than 2.5 hours. The order in which the parties shall present arguments at the hearing shall be as indicated below, with Plaintiff presenting first for each argument:

- 1) Technology and patent overview;
- 2) a. "scan[ning] a network" and
b. "a scanning system;"
- 3) a. "relevance to at least one of the query and the first user" and
b. "[informons/information] relevant to a query;"
- 4) "combining;"
- 5) "demand search;"
- 6) a. "collaborative feedback data" and

b. “[feedback system for] receiving information found to be relevant to the query by other users;”

7) “individual user” and “first user;”

8) Order of steps;

9) The separateness of the claimed systems;

10) Antecedent basis terms.

[DEFENDANTS’ PROPOSAL]

The hearing shall last for no more than 3.5 hours. The order in which the parties shall present arguments at the hearing shall be as follows:

1) Technology and patent overview (20 minutes per side); Plaintiff presents first.

2) “[Feedback system for] receiving information found to be relevant to the query by other users” and “collaborative feedback data;” Defendants present argument first.

3) “Scan[ning] a network” and “a scanning system;” Defendants present argument first.

4) “Combining;” Plaintiff presents argument first.

5) The separateness of the claimed systems; Defendants present argument first.

6) “Relevance to at least one of the query and the first user” and “[informons/information] relevant to a query;” Plaintiff presents argument first.

7) “Demand search;” Plaintiff presents argument first.

8) “Individual user” and “first user;” Defendants present argument first.

9) Antecedent basis terms; Defendants present argument first.

10) Order of steps; Defendants present argument first.

[DEFENDANTS’ ALTERNATIVE PROPOSAL]

1) Technology and patent overview (20 minutes per side); Plaintiff presents first.

2) “[Feedback system for] receiving information found to be relevant to the query by other users” and “collaborative feedback data;” Defendants present argument first.

- 3) "Scan[ning] a network" and "a scanning system;" Plaintiff presents argument first.
- 4) "Combining;" Defendants present argument first.
- 5) The separateness of the claimed systems; Plaintiff presents argument first.
- 6) "Relevance to at least one of the query and the first user" and "[informons/information] relevant to a query;" Defendants presents argument first.
- 7) "Demand search;" Plaintiff presents argument first.
- 8) "Individual user" and "first user;" Defendants present argument first.
- 9) Antecedent basis terms; Plaintiff presents argument first.
- 10) Order of steps; Defendants present argument first.

IT IS SO ORDERED.

Signed this _____ day of _____, 2012

Raymond A. Jackson
United States District Judge