## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

I/P ENGINE, INC.

Plaintiff,

v.

Civil Action No. 2:11-cv-512

AOL, INC., et al.,

Defendants.

## DEFENDANTS' MOTION FOR RECONSIDERATION IN PART OF CLAIM CONSTRUCTION ORDER

Defendants Google Inc., AOL Inc., IAC Search & Media, Inc., Target Corp., and Gannett Company, Inc. (collectively, "Defendants"), by counsel, respectfully move this Court for reconsideration in part of its Memorandum Opinion & Order as to the claim construction of U.S. Patent Nos. 6,314,420 and 6,775,664. (Dkt. 171.) Specifically, Defendants move the Court to reconsider its claim constructions for the terms "collaborative feedback data" (from '420 claims 10 and 25) and "[feedback system for] receiving information found to be relevant to the query by other users" (from '664 claims 1 and 26). Defendants respectfully submit that the Court's claim construction rulings as to these phrases were a result of a misunderstanding of the parties' actual dispute and also fail to take into account the parties' agreement that "collaborative feedback" necessarily requires feedback of users "with similar interests or needs." The grounds and authorities in support of this motion are set forth in the accompanying Memorandum In Support Of Motion For Reconsideration In Part Of Claim Construction Order.

Dated: June 22, 2012

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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 22, 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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