

Exhibit 1**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

I/P ENGINE, INC.,

Plaintiff,

v.

Civil Action No. 2:11-cv-512

AOL INC., *et al.*,

Defendants.

[PROPOSED] ORDER TO COMPEL PLAINTIFF TO PRODUCE DOCUMENTS

On this day came Defendant Google, Inc. ("Google"), by counsel, upon the Motion to Compel Plaintiff I/P Engine Inc. ("Plaintiff") to Produce Documents, and, upon consideration of the arguments set forth in the Notice, and for good cause shown, it is

ORDERED that Plaintiff, within five (5) days of the entry of this order, shall produce the following documents:

1. all documents provided by Innovate/Protect, Inc. to potential investors that concern the patents-in-suit and this litigation;
2. the consulting agreement between Dickstein Shapiro LLP ("Dickstein Shapiro") and Donald Kosak;
3. all documents of Andrew K. Lang responsive to Google's requests for production; and
4. all documents related to Dickstein Shapiro's pre-litigation involvement in offers to sell the patents-in-suit, negotiations related to the patents-in-suit, and the actual sale of the patents-in-suit from Lycos, Inc. to Plaintiff.

It is FURTHER ORDERED that, within five (5) days of the entry of this order, to the extent that any of Mr. Lang's documents responsive to Google's requests for production have not been maintained or no longer exist, Plaintiff shall provide an explanation for their destruction.

Dated: August _____, 2012

Entered: _____/_____/_____

F. Bradford Stillman, Magistrate Judge
United States District Court
Eastern District of Virginia

WE ASK FOR THIS:

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