

# EXHIBIT A

**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. and Counsel for Defendants AOL, INC., GOOGLE, INC., IAC SEARCH & MEDIA, INC., GANNETT COMPANY, INC., and TARGET CORPORATION (collectively “Defendants”) stipulate to the following:

1. By no later than November 7, 2011, Plaintiff shall provide Defendants with a preliminary identification of asserted claims.
2. By no later than November 7, 2011, Plaintiff shall provide Defendants with a claim chart for Google Adwords and Google Search identifying, for each element of each asserted independent claim, representative evidence relating to an allegedly infringing system or process. This disclosure shall in no way limit Plaintiff from supplementing, or from seeking and obtaining any discovery, or later identifying other claims, or accused systems or processes.
3. By no later than November 7, 2011, Plaintiff may serve Google its initial written discovery . Google shall serve its objections by no later than November 22, 2011. Google shall serve its responses, and produce responsive documents, by no later than December 7, 2011. Google’s initial production of documents shall be from the technical document repositories corresponding to the systems or functionalities identified in Plaintiff’s claim charts.

4. By no later than November 11, 2011, Plaintiff shall provide the non-Google Defendants with claim charts for their use of Google AdWords, AOL White Label, AOL Advertising, and Ask.com, identifying, for each element of each asserted independent claim, representative evidence relating to an allegedly infringing system or process. This disclosure shall in no way limit Plaintiff from supplementing, or from seeking and obtaining any discovery, or later identifying other claims, or accused systems or processes.

5. By no later than November 11, 2011, Plaintiff may serve non-Google Defendants its initial written discovery. The non-Google Defendants shall serve their objections by no later than November 28, 2011. The non-Google Defendants shall serve their responses, and produce responsive documents, by no later than December 12, 2011. The non-Google Defendants' initial production of documents shall be from the technical document repositories corresponding to the systems or functionalities identified in Plaintiff's claim charts.

6. Following production and review of such technical documents, should Plaintiff desire additional technical documents from the files of individual custodians, Defendants and Plaintiff shall meet-and-confer. The parties also shall meet and confer regarding Defendants' production of non-technical documents.

7. By no later than November 7, 2011, Defendants may serve their initial written discovery on Plaintiff. Plaintiff shall serve its objections by no later than November 22, 2011. Plaintiff shall serve its responses, and produce responsive documents, by no later than December 7, 2011. Plaintiff's document production in response to Defendants' initial document requests shall include at least the following categories of documents: (a) the complete file wrappers for the patents-in-suit; (b) the complete file wrappers for any patents that claim priority to the same parent application as the patents-in-suit; (c) any license agreements granting rights to either of the patents-in-suit; (d) documents sufficient to show the operation of any commercial embodiments of the patents-in-suit; (e) documents sufficient to show the conception of the patents-in-suit, including the date of such conception; and (f) documents sufficient to show the reduction-to-practice of the patents-in-suit, including the date of such reduction-to-practice.

8. Defendants shall not move or otherwise seek to transfer or sever any party from this Action, or otherwise assert that this venue is inconvenient for any reason.

9. Defendants shall file their Answers on November 14, 2011.

10. This Stipulation may be filed with the Court at the discretion of any Party.

Dated: November 4, 2011

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