

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

**DEFENDANTS' MOTION IN LIMINE #4 TO PRECLUDE PLAINTIFF FROM
OFFERING EVIDENCE OR ARGUMENT RELATING TO DEFENDANTS' CONDUCT
DURING DISCOVERY OR TO GOOGLE'S UNPRODUCED LICENSES**

Defendants respectfully file this Motion in Limine #4 to preclude Plaintiff from offering evidence or argument relating to Defendants' conduct during discovery or to Google's unproduced licenses. The grounds and authorities in support of this Motion are set forth in Defendants' Memorandum In Support of Motion in Limine #4 and the Declaration of Joshua L. Sohn, with exhibits, filed in connection with this Motion. A proposed order is attached hereto as **Exhibit 1**.

DATED: September 21, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 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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