EXHIBIT A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

I/P ENGINE, INC.,	)	
Plaintiff,	)	
v.	)	Civ. Action No. 2:11-cv-512
AOL, INC. et al.,	)	
Defendants.	)	

PLAINTIFF I/P ENGINE, INC.'S UPDATED INITIAL DISCLOSURES

Plaintiff I/P Engine, Inc. ("I/P Engine") makes the following updated initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. These disclosures are based upon I/P Engine's investigations to date, which are ongoing. I/P Engine reserves the right to correct, modify, and/or supplement these disclosures in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

A. IDENTIFICATION OF INDIVIDUALS PURSUANT TO RULE 26(a)(1)(A)

Pursuant to Rule 26(a)(1)(A), I/P Engine presently believes that the following individuals are likely to have discoverable information that I/P Engine may use to support their claims or defenses, excluding persons to be used solely for impeachment. Employees of I/P Engine, employees of Innovative/Protect, Inc., employees of Vringo, Inc. and the inventors should be contacted through I/P Engine's counsel of record. The subjects of discoverable information for which these individuals are identified are also provided.

Andrew K. Lang
Chief Technology Officer and Inventor
Vringo, Inc.
Subject(s) relating to: Conception and reduction to practice of the patents-in-suit, transfer of rights under the patents-in-suit, and market place factors relating to the patents-in-suit.

Donald M. Kosak
Technical Consultant and Inventor
Innovate/Protect, Inc.
Subject(s) relating to: Conception and reduction to practice of the patents-in-suit, transfer of rights under the patents-in-suit, market place factors relating to the patents-in-suit, and development and use of the technology underlying the patents-in-suit.

Alexander Berger
Chief Operating Officer
Vringo, Inc.
Subject(s) relating to: Transfer of rights under the patents-in-suit to I/P Engine; Vringo's business.

Andrew Perlman
Chief Executive Officer
Vringo, Inc.
Subject(s) relating to: Vringo's business.

Ira Heffan
TopCoder, Inc.
95 Glastonbury Blvd.
Glastonbury, Connecticut 06033
Subject(s) relating to: The filing and prosecution of the applications that issued as the patents-in-suit.

Andrew Abramson
Greenberg Traurig LLP
200 Park Avenue
P.O. Box 677
Florham Park, New Jersey 07932
Subject(s) relating to: The filing and prosecution of the applications that issued as the patents-in-suit.

One or more witnesses from AOL Inc.
770 Broadway
New York, New York 10003
Subject(s) relating to: Knowledge of the patents-in-suit, infringement, description, design, development, operation, structure, and uses of the accused systems, marketing, sales, and profits of the accused systems, the benefits associated with the use of the accused systems, and the relationships with other defendants in connection with the foregoing.

One or more witnesses from Google Inc.
1600 Amphitheatre Parkway
Mountain View, California 94043
Subject(s) relating to: Knowledge of the patents-in-suit, infringement, description, design, development, operation, structure, and uses of the accused systems, marketing, sales, and profits of the accused systems, the benefits associated with the use of the accused systems, and the relationships with other defendants in connection with the foregoing.

One or more witnesses from IAC Search & Media, Inc.
555 12th Street, #500
Oakland, California 94607
Subject(s) relating to: Knowledge of the patents-in-suit, infringement, description, design, development, operation, structure, and uses of the accused systems, marketing, sales, and profits of the accused systems, the benefits associated with the use of the accused systems, and the relationships with other defendants in connection with the foregoing.

One or more witnesses from Gannett Company, Inc.
7950 Jones Branch Drive
Tysons Corner, Virginia 22107
Subject(s) relating to: Knowledge of the patents-in-suit, infringement, description, design, development, operation, structure, and uses of the accused systems, marketing, sales, and profits of the accused systems, the benefits associated with the use of the accused systems, and the relationships with other defendants in connection with the foregoing.

One ore more witnesses from Target Corporation
1000 Nicollet Mall
Minneapolis, Minnesota 55403
Subject(s) relating to: Knowledge of the patents-in-suit, infringement, description, design, development, operation, structure, and uses of the accused systems, marketing, sales, and profits of the accused systems, the benefits associated with the use of the accused systems, and the relationships with other defendants in connection with the foregoing.

I/P Engine reserves the right to rely upon information derived from additional persons as such individuals come to its attention through further discovery and investigation, to rely upon evidence obtained from any persons identified by the defendants, and to rely upon evidence obtained from the foregoing individuals with respect to any subject.

B. DESCRIPTION OF DOCUMENTS PURSUANT TO RULE 26(a)(1)(B)

Pursuant to Rule 26(a)(1)(B), the following is a description of the documents, data compilations, and tangible things, in the possession, custody, or control of I/P Engine or its retained counsel, that I/P Engine presently believes may be used to support its claims or defenses, excluding such documents, data compilations and tangible things to be used solely for impeachment.

- U.S. Patent Nos. 6,314,420 ("the '420 patent") and 6,775,664 ("the '664 patent")
- The prosecution history files for the '420 and '664 patents
- Conception, diligence, and reduction to practice documents related to the '420 and '664 patents
- Documents relating to ownership of and rights under the '420 and '664 patents
- Documents relating to the operation of defendants' accused products, methods and systems
- Documents relating to revenue, sales, forecasts, costs and profits for defendants' accused products, methods and systems
- Documents relating to licenses pertaining to the '420 and '664 patents or other inventions relating to Internet marketing system(s) or service(s) that seeks to promote websites by presenting search results on search engine result pages through the use of defendants' accused products, methods and systems
- Documents relating to defendants' knowledge of the '420 and '664 patents

I/P Engine reserves the right to rely upon any additional documents obtained through further discovery and investigation, and any documents identified or produced by others in this litigation.

C. COMPUTATION OF DAMAGES

I/P Engine has incurred economic harm as a result of defendants' infringement of the patents-in-suit the amount of which cannot be calculated at this time.[1] Pursuant to 35 U.S.C. § 284, I/P Engine seeks damages adequate to compensate it for defendants' infringement of the asserted patents-in-suit in the form of at least a reasonable royalty to compensate I/P Engine for defendants' patent infringement, together with pre- and post-judgment interest and costs as fixed by this Court. I/P Engine may also seek increased damages based on defendants' willful infringement of the patents-in-suit. I/P Engine also seeks all other damages, fees, and costs, to which it is entitled pursuant to applicable law, including without limitation attorney's fees pursuant to 35 U.S.C. § 285.

I/P Engine reserves the right to modify or change its damages theories and calculations as appropriate in view of information to be discovered in this case and in view of further anticipated expert opinions on the subject of damages.

D. INSURANCE AGREEMENTS

I/P Engine is not aware of any insurance agreements pertinent to this litigation.

Dated: August 8, 2012

By: /s/ Charles J. Monterio, Jr.

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[1] *See* Advisory Comm. Note to 1993 Amendment to Fed. R. Civ. P. 26(a)(1) ("[A] party would not be expected to provide calculation of damages which, as in many patent infringements actions, depends on information in the possession of another party or person.").

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Counsel for Plaintiff I/P Engine, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of August, 2012, the foregoing **PLAINTIFF I/P ENGINE, INC.'S UPDATED INITIAL DISCLOSURES**, was served via email, on the following:

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/s/ Armands Chagnon

Senior Paralegal