

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

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I/P ENGINE, INC.,)	
	Plaintiff,)	
	v.)	Civ. Action No. 2:11-cv-512
)	
AOL, INC. et al.,)	
	Defendants.)	
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**[PROPOSED] ORDER GRANTING PLAINTIFF I/P ENGINE, INC.’S
FIRST MOTION *IN LIMINE* TO EXCLUDE INADMISSIBLE EVIDENCE**

This Court, having considered Plaintiff I/P Engine, Inc.’s First Motion *In Limine* and accompanying Memorandum in Support thereof, and finding good cause exists, hereby ORDERS that the motion is GRANTED as follows:

Defendants are hereby precluded from offering any evidence of, making reference to, or making suggestion of the following topics in the trial of this case:

1. the recently filed reexamination of U.S. Patent No. 6,314,420;
2. recent offers and other negotiations for, and the 2011 purchase price of, the patent portfolio that included the patents-in-suit;
3. the fee arrangement between I/P Engine and its counsel;
4. claim construction arguments that were not adopted by this Court;
5. claims that were previously included in this case but are no longer asserted, including claims against Google Search and defendants AOL and IAC’s Ask Sponsored Listings;

6. derogatory, inflammatory, confusing and irrelevant terms such as “patent troll,” “shell corporation,” “paper patent” holder, or “non-practicing entity”;
7. any testimony or opinions about evidence or any other subject beyond the scope of the discussion and analysis in their expert report;
8. any reference to discussions or correspondence between counsel that did not go to the Court, including discovery disputes, negotiations, claims of privilege, or motions for relief sought but not granted; and
9. any reference to courtroom observers or jury consultants.

So Ordered:

Dated: September __, 2012

United States District Court
Eastern District of Virginia