

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

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

**JOINT MOTION AND MEMORANDUM IN SUPPORT OF
JOINT MOTION TO MODIFY SCHEDULING ORDER**

Defendants AOL Inc., Google Inc., IAC Search & Media, Inc., Gannett Company, Inc., and Target Corporation (collectively, the “Defendants”), and Plaintiff, I/P Engine, Inc. (“I/P Engine”), by counsel, for their Joint Motion to Modify the Scheduling Order in this matter, state as follows:

1. The parties hereby request modifying the Rule 16(b) Scheduling Order in order to set deadlines for the filing and briefing of certain pretrial motions.

2. On September 24, 2012, the Defendants filed a Motion to Seal and Close the Courtroom (Dkt. No. 346). In an effort to expedite the briefing of the motion and complete it before the scheduled Final Pretrial Conference on October 5, 2012, the parties have agreed and request that this Court enter an order setting the following deadlines for briefing Defendants’

Motion to Close Courtroom:

- Plaintiff shall file its response to the Defendants’ Motion to Close Courtroom on or before **Monday October 1, 2012**; and
- Defendant shall file its Reply Brief in Support of Defendants’ Motion to Close Courtroom on or before **October 4, 2012**.

3. Modification of the Scheduling Order as proposed in this motion will not require adjustment of other dates set forth in the Scheduling Order, including, without limitation, the trial date.

WHEREFORE, the Defendants and I/P Engine request that the Court modify the Rule 16(b) Scheduling Order in accordance with the proposed Agreed Order attached as **Exhibit 1**.

DATED: September 25, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on September 25, 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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