

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

I/P ENGINE, INC.,

Plaintiff,

v.

Civil Action No. 2:11cv512 (RAJ-FBS)

AOL INC., GOOGLE, INC.,  
IAC SEARCH & MEDIA, INC.,  
GANNETT CO., INC. and  
TARGET CORPORATION

Defendants.

**MOTION AND MEMORANDUM IN SUPPORT OF MOTION FOR  
EXTENSION OF TIME TO FILE OBJECTIONS TO DISCOVERY**

The defendants AOL Inc. (“AOL”), IAC Search & Media, Inc. (“IAC Search”), Gannett Co., Inc. (“Gannett”) and Target Corporation (“Target”) (collectively, “non-Google Defendants”), by counsel, pursuant to Rule 26(C) of the Local Rules of Practice for the United States District Court for the Eastern District of Virginia, move this Court for entry of an order granting the non-Google Defendants an additional two days through November 30, 2011, in which to file their objections to the plaintiff’s First Set of Interrogatories and Requests for Production of Documents (“Plaintiff’s First Discovery Requests”), and in support thereof states as follows:

1. Plaintiff issued its discovery requests to the non-Google Defendants. Objections under Local Rule 26 are not due until November 28, 2011.

2. The non-Google Defendants have requested, and the plaintiff has agreed, to provide an additional two days through November 30, 2011, for the non-Google Defendants to serve their objections to the Plaintiff's First Discovery Requests.

3. Granting an additional two days for the non-Google Defendants to file their objections to the Plaintiff's First Discovery Requests will not prejudice the plaintiff and will facilitate a more complete and efficient discovery process.

4. Attached as **Exhibit 1** is a proposed agreed order granting the non-Google Defendants through November 30, 2011, in which to file their objections to Plaintiff's First Discovery Requests. The parties are circulating a copy of this agreed order and will deliver it to the Court for entry once endorsed.

WHEREFORE, the non-Google Defendants, by counsel, request that this Court enter the proposed agreed order attached as **Exhibit 1** granting the non-Google Defendants through November 30, 2011, in which to file their objections to the Plaintiff's First Discovery Requests.

Dated: November 23, 2011

Respectfully submitted,

/s/ Stephen E. Noona  
Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
[senoona@kaufcan.com](mailto:senoona@kaufcan.com)

David Bilsker  
David A. Perlson  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111

Telephone: (415) 875-6600  
Facsimile: (415) 875-6700  
davidbilsker@quinnemanuel.com  
[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)

*Counsel for AOL Inc., IAC Search & Media, Inc.,  
Gannett Co., Inc. and Target Corporation*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 23, 2011, 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:

Jeffrey K. Sherwood  
Kenneth W. Brothers  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street NW  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201  
[sherwoodj@dicksteinshapiro.com](mailto:sherwoodj@dicksteinshapiro.com)  
[brothersk@dicksteinshapiro.com](mailto:brothersk@dicksteinshapiro.com)

*Counsel for Plaintiff, I/P Engine, Inc.*

Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 W. Main Street, Suite 2100  
Norfolk, VA 23510-1665  
Telephone: (757) 624-3239  
Facsimile: (757) 624-3169  
[senoona@kaufcan.com](mailto:senoona@kaufcan.com)

*Counsel for AOL Inc., Google, Inc.,  
Gannett Co., Inc., Target Corporation and  
IAC Search & Media, Inc.*

/s/ Stephen E. Noona  
Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624-3000  
Facsimile: (757) 624-3169  
[senoona@kaufcan.com](mailto:senoona@kaufcan.com)