

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 FOR EXTENSION OF TIME FOR GOOGLE, INC.
TO FILE RESPONSIVE PLEADINGS TO COMPLAINT**

The defendant Google, Inc. (“Google”), by counsel, moves this Court for an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint filed by I/P Engine, Inc. (“I/P Engine”), and in support thereof states as follows:

1. On September 15, 2011, I/P Engine filed its Complaint for patent infringement against Google. On September 23, 2011, I/P Engine served its Complaint upon Google.
2. Google’s responsive pleadings are not due until October 14, 2011.
3. Google has requested and I/P Engine has agreed to allow Google an extension of time through November 14, 2011, for Google to answer, plead, or otherwise respond to the Complaint filed by I/P Engine.
4. Attached as **Exhibit A** is a proposed agreed order granting Google an extension of time through November 14, 2011, to answer, plead or otherwise respond to the Complaint

filed by I/P Engine. The proposed agreed order is being circulated for endorsement and will be delivered to the Court once it is fully signed.

WHEREFORE, Google, by counsel, requests that this Court enter the attached proposed agreed order granting Google an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint.

Dated: October 4, 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

Counsel for Google, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on October 4, 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
brothersk@dicksteinshapiro.com

Counsel for Plaintiff, I/P Engine, 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

Counsel for Google, Inc.

11318740_1.DOC