

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

I/P ENGINE, INC.

Plaintiff,

v.

AOL INC., *et al.*,

Defendants.

Civil Action No. 2:11-cv-512

**DEFENDANTS' MOTION TO STRIKE PLAINTIFF'S DEPOSITION DESIGNATIONS**

Defendants Google Inc., AOL Inc., Target Corp., IAC Search & Media, Inc., and Gannett Co., Inc., by counsel, respectfully move this Court for an order striking Plaintiff's deposition designations with prejudice or, in the alternative, to strike them and require Plaintiff to provide a set of narrow deposition designations that accurately reflect the testimony they intend to present at trial, within 24 hours of the Court's Order. The grounds and authorities in support of this motion are set forth in the accompanying Brief in Support of Defendants' Motion, the Declaration of Emily C. O'Brien in Support of Defendants' Motion, and the associated Exhibits.

DATED: October 5, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 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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