

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 FOR JUDGMENT AS A MATTER OF LAW
OF LACHES**

Defendants AOL Inc. ("AOL"), Google Inc. ("Google"), IAC Search & Media, Inc. ("IAC Search"), Gannett Co., Inc. ("Gannett") and Target Corporation ("Target") (collectively "Defendants") respectfully request that the Court to grant judgment as a matter of law of laches. The grounds and authorities in support of this Motion are set forth in the accompanying Memorandum In Support of Defendants' Motion for Judgment as a Matter of Law of Laches. A proposed order is attached is attached as **Exhibit 1**.

DATED: October 31, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on October 31, 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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