

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.

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE RESPONSES TO
PLAINTIFF'S NOTICE OF CALCULATION OF PREJUDGMENT INTEREST AND
MOTION FOR AN AWARD OF PREJUDGMENT INTEREST, POST-JUDGMENT
INTEREST, AND SUPPLEMENTAL DAMAGES FOR DEFENDANTS' POST-
DISCOVERY/PRE-VERDICT INFRINGEMENT**

The Defendants AOL Inc. ("AOL"), IAC Search & Media, Inc. ("IAC Search & Media"), Gannett Co., Inc. ("Gannett"), Target Corporation ("Target"), and Google Inc. ("Google") (collectively "Defendants"), by counsel, pursuant to Rule 7 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 Defendants an extension of time through and including November 29, 2012, in which to file their Response to Plaintiff's Notice of Calculation of Prejudgment Interest (Dkt. No. 791) ("Notice of Calculation") and Plaintiff's Motion for an Award of Prejudgment Interest, Post-Judgment Interest, and Supplemental Damages for Defendants' Post-Discovery/Pre-Verdict Infringement (Dkt. No. 792) ("Motion for Award of Prejudgment Interest"), and in support thereof state as follows:

1. Plaintiff filed its Notice of Calculation on November 7, 2012. Under Local Rule 7 and Fed. R. Civ. P. 6, Defendants' response is due on November 21, 2012.

2. Plaintiff filed its Motion for Award of Prejudgment Interest on November 9, 2012. Under Local Rule 7 and Fed. R. Civ. P. 6, Defendants' response is due on November 23, 2012.

3. The Defendants have requested, and the Plaintiff has agreed to, an extension through and including November 29, 2012, to file their response to the Plaintiff's Motion for an Award of Prejudgment Interest, Post-Judgment Interest, and Supplemental Damages for Defendants' Post-Discovery/Pre-Verdict Infringement.

4. Defendants will not oppose an extension until December 7, 2012, for Plaintiff to file its replies in support of its Notice of Calculation and Motion for Award of Prejudgment Interest.

5. Granting Defendants an extension through and including November 29, 2012, to file their responses to the Plaintiff's Notice of Calculation and Motion for Award of Prejudgment Interest, and Plaintiff an extension through and including December 7, 2012 to file their replies in support of its Notice of Calculation and Motion for Award of Prejudgment Interest will not prejudice the parties.

6. Attached as **Exhibit 1** is a proposed agreed order granting the Defendants through and including November 29, 2012 to file their response to the Plaintiff's Notice of Calculation and Motion for Award of Prejudgment Interest, and granting Plaintiff through and including December 7, 2012 to file its replies in support of its Notice of Calculation and Motion for Award of Prejudgment Interest. The parties are circulating a copy of this agreed order and will deliver it to the Court for entry once endorsed.

WHEREFORE, the Defendants, by counsel, request that this Court enter the proposed agreed order attached as **Exhibit 1** granting the Defendants through and including November 29, 2012 to file their response to Plaintiff's Notice of Calculation and Motion for Award of Prejudgment Interest, and granting Plaintiff through and including December 7, 2012, to file its replies in support of its Notice of Calculation and Motion for Award of Prejudgment Interest.

Dated: November 19, 2012

Respectfully submitted,

/s/ Stephen E. Noona

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Counsel for Defendant AOL Inc.

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 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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