

**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

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT OF UNOPPOSED
MOTION TO STAY EXECUTION OF JUDGMENT PENDING DISPOSITION OF A
MOTION**

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, file this unopposed motion to stay execution of judgment pursuant to Rule 62(b) of the Federal Rules of Civil Procedure.

On November 21, 2012, the Court entered a Final Judgment. (D.N. 801.) Prior to the jury’s verdict and the Court’s entry of judgment, Defendants filed several Motions for Judgment as a Matter of Law pursuant to Fed. R. Civ. P. 50(a). (*See, e.g.*, D.N. 751, 753, 772, 775.) Defendants intend to file post-judgment motions with the Court, including renewed Motions for Judgment as a Matter of Law pursuant to Fed. R. Civ. P. 50(b). Accordingly, pursuant to Fed. R. Civ. P. 62(b), Defendants file this motion requesting that the Court stay any proceedings to execute on or enforce the Final Judgment against Defendants pending disposition of all such motions.

Counsel for Defendants has conferred with counsel for Plaintiff I/P Engine, Inc. (“I/P Engine”), and I/P Engine does not oppose the relief requested by Defendants.

WHEREFORE, the Defendants, by counsel, request that this Court enter the proposed agreed order attached as **Exhibit 1** staying any proceedings to execute on or enforce the Final Judgment against Defendants pending resolution of any post-judgment motions timely filed in this case.

DATED: December 3, 2012

/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

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

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

/s/ Stephen E. Noona

Stephen E. Noona
Virginia State Bar No. 25367
KAUFMAN & CANOLES, P.C.
150 W. Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3000
Facsimile: (757) 624-3169

Robert L. Burns
FINNEGAN, HENDERSON, FARABOW, GARRETT &
DUNNER, LLP

Two Freedom Square
11955 Freedom Drive
Reston, VA 20190
Telephone: (571) 203-2700
Facsimile: (202) 408-4400

Cortney S. Alexander
FINNEGAN, HENDERSON, FARABOW, GARRETT &
DUNNER, LLP
3500 SunTrust Plaza
303 Peachtree Street, NE
Atlanta, GA 94111
Telephone: (404) 653-6400
Facsimile: (415) 653-6444

Counsel for Defendant AOL Inc.

KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
senoona@kaufcan.com

12082755v1