

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

**JOINT MOTION AND MEMORANDUM IN SUPPORT OF JOINT MOTION FOR
ENTRY OF AGREED PROTECTIVE ORDER**

The parties, by counsel, pursuant to Rule 26 of the Federal Rules of Civil Procedure and Rule 5 of the Local Rules of Practice for the United States District Court for the Eastern District of Virginia (“Local Rules of Practice”), move this Court for the entry of the parties’ Agreed Protective Order (“Agreed Protective Order”), a copy of which is attached as **Exhibit 1**, and in support thereof state as follows:

1. This is a patent infringement matter in which the plaintiff and the defendants have asserted claims against each other under the patent law.
2. During discovery, the parties and non-parties will be producing confidential, proprietary, non-public financial information, and commercially sensitive information, all of which is defined as protective material under the parties’ Agreed Protective Order.
3. The parties have agreed to, and attach as **Exhibit 1** to this motion, a proposed Agreed Protective Order, a copy of which will be fully endorsed by counsel and forwarded to the

Court. The entry of this Agreed Protective Order will facilitate the exchange of discovery in this matter and the protection of confidential, proprietary information.

4. The Agreed Protective Order provides that any materials to be sealed shall be filed in accordance with Rule 5 of the Local Rules of Practice.

WHEREFORE, the parties, by counsel, request that this Court enter the Agreed Protective Order attached as **Exhibit 1**.

Dated: January 19, 2012

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

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

*Attorneys for Attorneys or IAC Search &
Media, Inc., Gannett Company, Inc.,
Google Inc. and Target Corporation*

/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

Gerald F. Ivey
FINNEGAN, HENDERSON, FARABOW, GARRETT
& DUNNER, LLP
901 New York Avenue, N.W.
Washington, D.C. 20001-4413
Telephone: (202) 408-4000
gerald.ivey@finnegan.com

Robert L. Burns
FINNEGAN, HENDERSON, FARABOW, GARRETT
& DUNNER, LLP
Two Freedom Square
11955 Freedom Drive, Suite 800
Reston, VA 20190-5675
Telephone: (571) 203-2700
robert.burns@finnegan.com

Cortney S. Alexander
FINNEGAN, HENDERSON, FARABOW, GARRETT
& DUNNER, LLP
3500 SunTrust Plaza
303 Peachtree Street NE
Atlanta, GA 30308
Tel: 404.653.6400
cortney.alexander@finnegan.com

Attorneys for Defendant AOL Inc.

/s/ Donald C. Schultz

Donald C. Schultz
W. Ryan Snow
Steven Stancliff
CRENSHAW, WARE & MARTIN, P.L.C.
150 West Main Street, Suite 1500
Norfolk, VA 23510

Telephone: (757) 623-3000
Facsimile: (757) 623-5735
dschultz@cwm-law.com
wrsnow@cwm-law.com
sstancliff@cwm-law.com

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.

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2012, I will electronically file the foregoing with the Clerk of the 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

Donald C. Schultz
W. Ryan Snow
Steven Stancliff
CRENSHAW, WARE & MARTIN, P.L.C.
150 West Main Street, Suite 1500
Norfolk, VA 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735
dschultz@cwm-law.com
wrsnow@cwm-law.com
sstancliff@cwm-law.com

Counsel for Plaintiff, I/P Engine, Inc.

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.,
Target Corporation,
IAC Search & Media, Inc., and
Gannet Co., Inc.*

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

Gerald F. Ivey
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
901 New York Avenue, N.W.
Washington, D.C. 20001-4413
Telephone: (202) 408-4000
gerald.ivey@finnegan.com

Robert L. Burns
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
Two Freedom Square
11955 Freedom Drive, Suite 800
Reston, VA 20190-5675
Telephone: (571) 203-2700
robert.burns@finnegan.com

Cortney S. Alexander
FINNEGAN, HENDERSON, FARABOW, GARRETT & DUNNER, LLP
3500 SunTrust Plaza
303 Peachtree Street NE
Atlanta, GA 30308
Tel: 404.653.6400
cortney.alexander@finnegan.com

Attorneys for Defendant AOL Inc.

/s/ Stephen E. Noona
Stephen E. Noona
Virginia State Bar No. 25367
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Facsimile: (757) 624.3169
senoona@kaufcan.com