

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 COMPEL DEPOSITION OF DR. BECKER

Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., Gannett Co., Inc., and AOL Inc. (collectively, "Defendants") respectfully move this Court for an Order directing Plaintiff to make Dr. Becker available for deposition. Defendants further request that the Court order that the deadline for Defendants' opposition to Plaintiff's Motion for an Award of Post-Judgment Royalties be extended until at least seven days after Plaintiff makes Dr. Becker available for deposition.¹ The grounds and authorities in support of this Motion are set forth in Defendants' Memorandum In Support of Motion to Compel Deposition of Dr. Becker and the Declaration of Stephen E. Noona, with exhibits, filed in connection with this Motion. A proposed order is attached hereto as **Exhibit 1**.

¹ Defendants note this requested relief does not alter the relief sought in Defendants' Motion to Postpone Briefing and Ruling on Plaintiff's Motion for Post-Judgment Royalties. (D.N. 847.) Defendants request that the Court compel the deposition of Dr. Becker, and that the deposition be at least seven days prior to the deadline for Defendants' opposition to Plaintiff's Motion for an Award of Post-Judgment Royalties, whenever that deadline may be.

Pursuant to Local Rule 37(E), counsel have attempted in good faith to resolve the foregoing dispute.

DATED: January 16, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2013, 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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