## 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.

## MOTION FOR EXTENSION OF TIME FOR AOL INC. TO FILE RESPONSIVE PLEADINGS TO COMPLAINT

The defendant AOL Inc. ("AOL"), by counsel, moves this Court for an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint filed by I/P Engine, Inc. ("I/P Engine"), and in support thereof states as follows:

1. On September 15, 2011, I/P Engine filed its Complaint for patent infringement against AOL. On September 23, 2011, I/P Engine served its Complaint upon AOL.

2. AOL's responsive pleadings are not due until October 14, 2011.

3. AOL has requested and I/P Engine has agreed to allow AOL an extension of time

through November 14, 2011, for AOL to answer, plead, or otherwise respond to the Complaint filed by I/P Engine.

4. Attached as **Exhibit A** is a proposed agreed order granting AOL an extension of time through November 14, 2011, to answer, plead or otherwise respond to the Complaint filed

by I/P Engine. The proposed agreed order is being circulated for endorsement and will be delivered to the Court once it is fully signed.

WHEREFORE, AOL, by counsel, requests that this Court enter the attached proposed agreed order granting AOL an extension of time through November 14, 2011, to answer, plead, or otherwise respond to the Complaint.

Dated: October 4, 2011

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

Counsel for AOL Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2011, 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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Counsel for Plaintiff, I/P Engine, Inc.

/s/ Stephen E. Noona

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Counsel for AOL Inc.

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