

by the Court.” Good cause exists for this Court to direct a shorter time.

Because I/P Engine must obtain the information the Court ordered to be produced and conduct depositions in sufficient time to permit the completion of expert witness reports by September 25, 2013, if the Motion to Show Cause is granted, the normal response time of 11 days and the imposition of additional time for compliance with the Court’s order, will significantly prejudice I/P Engine. Because of Defendants’ failure to comply with the Court’s order, there is not enough time for I/P Engine to prepare its expert reports.

In an effort to expedite resolution of this issue, I/P Engine respectfully requests this Court to require Defendants to respond to I/P Engine’s Motion to Show Cause on or before September 4, 2013. Further, I/P Engine will waive its right to reply to Defendants’ response and requests an oral hearing before this Court on the Motion to Show Cause on September 5 or 6 or at another time convenient for this Court.

Dated: August 29, 2013

By: /s/ Jeffrey K. Sherwood
Donald C. Schultz (Virginia Bar No. 30531)
W. Ryan Snow (Virginia Bar No. 47423)
CRENSHAW, WARE & MARTIN P.L.C.
150 West Main Street
Norfolk, VA 23510
Telephone: (757) 623-3000
Facsimile: (757) 623-5735

Jeffrey K. Sherwood (Virginia Bar No. 19222)
Frank C. Cimino, Jr.
Kenneth W. Brothers
Dawn Rudenko Albert
Charles J. Monterio, Jr.
Jonathan Falkler
DICKSTEIN SHAPIRO LLP
1825 Eye Street, NW
Washington, DC 20006
Telephone: (202) 420-2200
Facsimile: (202) 420-2201

Counsel for Plaintiff I/P Engine, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August 2013, the foregoing **PLAINTIFF I/P ENGINE'S MOTION AND SUPPORTING MEMORANDUM TO SHORTEN DEFENDANTS' TIME TO RESPOND TO I/P ENGINE'S MOTION FOR DEFENDANTS TO SHOW CAUSE UNDER RULE 37 FOR NONCOMPLIANCE WITH AUGUST 13, 2013 ORDER**, was served via the Court's CM/ECF system, on the following:

(and via hand delivery to:)

Stephen Edward Noona
Kaufman & Canoles, P.C.
150 W Main St
Suite 2100
Norfolk, VA 23510
senoona@kaufcan.com

David Bilsker
David Perlson
Quinn Emanuel Urquhart & Sullivan LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
davidbilsker@quinnemanuel.com
davidperlson@quinnemanuel.com

Robert L. Burns
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190
robert.burns@finnegan.com

Cortney S. Alexander
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
3500 SunTrust Plaza
303 Peachtree Street, NE
Atlanta, GA 94111
cortney.alexander@finnegan.com

/s/ Jeffrey K. Sherwood