

**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

STIPULATION

Counsel for Plaintiff I/P Engine, Inc. (“I/P Engine”) and Counsel for Defendants AOL Inc., Google Inc., IAC Search & Media, Inc., Target Corporation, and Gannett Co., Inc. (collectively “Defendants”) stipulate to the following:

1. On January 3, 2014, this Court awarded supplemental damages in the amounts of \$16,109,362 against Google Inc., \$456,198 against AOL Inc., \$746,926 against IAC Search & Media, Inc., \$213 against Gannett Co., Inc., and \$8,499 against Target Corp. (together the “Supplemental Judgment”). (Docket No. 1015.) This Court also awarded prejudgment interest in amounts of \$278,067 against Google Inc., \$139,790 against AOL Inc., \$76 against Gannett Co., Inc., \$117,035 against IAC Search & Media, Inc., and \$1,739 against Target Corp. (together the “Prejudgment Interest Award”). (*Id.*)

2. The parties have agreed to stay any proceeding to execute or enforce this judgment against Defendants for the Supplemental Judgment and Prejudgment Interest Award

pending resolution of all of the related pending appeals (Case Nos. 13-1307, 13-1313, and 14-1233), and for thirty (30) days thereafter.

3. The parties have also agreed that a supersedeas bond is not necessary to protect I/P Engine's interests pending Defendants' appeal of this case.

4. Consistent with Local Rule 62(B) for the United States District Court for the Eastern District of Virginia, the requirement of the posting of a supersedeas bond pending Defendants' appeal of this case is waived.

5. This stipulation will terminate thirty (30) days after service of the issuance of a mandate from the United States Court of Appeal for the Federal Circuit, unless Defendants post a supersedeas bond in an amount sufficient to cover the Supplemental Judgment and Prejudgment Interest Award amounts that remain after appeal.

6. Because Google is indemnifying the other Defendants for the Supplemental Judgment and Prejudgment Interest Award, Google will satisfy in full any Supplemental Judgment and Prejudgment Interest Award amounts that remain after appeal against all Defendants.

7. This stipulation has no relation to, and does not affect any request by I/P Engine for any future damages, including ongoing royalties, or any opposition to such request by Defendants.

8. This Stipulation represents the entire agreement of the parties to this action regarding the matters set forth herein.

So stipulated:

Dated: January 14, 2014

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*Counsel for Defendants AOL Inc., Google Inc., IAC
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Gannett Company, Inc.*

Dated: _____

SO ORDERED:

Honorable Raymond A. Jackson

CERTIFICATE OF SERVICE

I hereby certify that on January 14, 2014, 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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