

**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

**UNOPPOSED MOTION AND MEMORANDUM IN SUPPORT OF UNOPPOSED
MOTION TO STAY EXECUTION OF JUDGMENT PENDING DISPOSITION OF A
MOTION**

The Defendants AOL Inc. (“AOL”), IAC Search & Media, Inc. (“IAC Search & Media”), Gannett Co., Inc. (“Gannett”), Target Corporation (“Target”), and Google Inc. (“Google”) (collectively “Defendants”), by counsel, file this unopposed motion to stay execution of judgment pursuant to Rule 62(b) of the Federal Rules of Civil Procedure.

On November 21, 2012, the Court entered a Final Judgment. (D.N. 801.) Prior to the jury’s verdict and the Court’s entry of judgment, Defendants filed several Motions for Judgment as a Matter of Law pursuant to Fed. R. Civ. P. 50(a). (*See, e.g.*, D.N. 751, 753, 772, 775.) Defendants intend to file post-judgment motions with the Court, including renewed Motions for Judgment as a Matter of Law pursuant to Fed. R. Civ. P. 50(b). Accordingly, pursuant to Fed. R. Civ. P. 62(b), Defendants file this motion requesting that the Court stay any proceedings to execute on or enforce the Final Judgment against Defendants pending disposition of all such motions.

Counsel for Defendants has conferred with counsel for Plaintiff I/P Engine, Inc. (“I/P Engine”), and I/P Engine does not oppose the relief requested by Defendants.

WHEREFORE, the Defendants, by counsel, request that this Court enter the proposed agreed order attached as **Exhibit 1** staying any proceedings to execute on or enforce the Final Judgment against Defendants pending resolution of any post-judgment motions timely filed in this case.

DATED: December 3, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on December 3, 2012, 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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