

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

**MOTION TO SEAL (1) PORTIONS OF THE DECLARATION OF KRISTIN ZMRHAL  
IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTION FOR  
LEAVE TO FILE SUPPLEMENTAL MEMORANDUM REGARDING MOTION TO  
SHOW CAUSE; (2) PORTIONS OF EXHIBITS 6-8 TO THE DECLARATION OF  
JOSHUA L. SOHN IN SUPPORT THEREOF; AND (3) EXHIBITS 9-10 TO THE  
DECLARATION OF JOSHUA L. SOHN IN SUPPORT THEREOF**

Pursuant to Local Rule 5 and the Agreed Protective Order entered in this matter on January 23, 2012 (Doc. No. 85) ("Protective Order"), Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., Gannett Co., Inc. and AOL Inc. (collectively "Defendants"), respectfully move this Court for entry of the attached Order permitting Defendants to file under seal (1) Portions of the Declaration of Kristin Zmrhal in Support of Defendants' Opposition to Plaintiff's Motion for Leave to File Supplemental Memorandum Regarding Motion to Show Cause ("Portions of the Zmrhal Declaration"); (2) Portions of Exhibits 6-8 to the Declaration of Joshua L. Sohn in Support of Defendants' Opposition to Plaintiff's Motion for Leave to File Supplemental Memorandum Regarding Motion to Show Cause and Motion to Strike Plaintiff's Supplemental Memorandum ("Portions of Exhibits 6-8 to the Sohn Declaration"); and (3) Exhibits 9-10 to the Declaration of Joshua L. Sohn in Support of

Defendants' Opposition to Plaintiff's Motion for Leave to File Supplemental Memorandum Regarding Motion to Show Cause and Motion to Strike Plaintiff's Supplemental Memorandum ("Exhibits 9-10 to the Sohn Declaration"). In compliance with Local Rule 5, Defendants attach a Proposed Order as **Exhibit 1** and are filing separately a Public Notice of Defendants' Motion to Seal. Defendants request that the Court retain sealed materials until forty-five (45) days after a final order is entered and request that, unless the case is appealed, any sealed materials be returned to counsel for the filing parties.

DATED: October 21, 2013

/s/ Stephen E. Noona

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 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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