

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 PORTIONS OF DEFENDANTS' RESPONSIVE BRIEF ON ISSUES  
RAISED IN THE COURT'S AUGUST 14 ORDER**

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 Portions of Defendants' Responsive Brief on Issues Raised in the Court's August 14 Order ("Portions of Defendants' Responsive Brief"). 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: November 11, 2013

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 11, 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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