

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

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|-------------------|---|-----------------------------|
| I/P ENGINE, INC., |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | Civ. Action No. 2:11-cv-512 |
| |) | |
| AOL, INC. et al., |) | |
| |) | |
| Defendants. |) | |
| |) | |

**NOTICE OF MOTION TO SEAL EXHIBITS 15, 16, 17, 18, AND 21 OF I/P ENGINE'S
MEMORANDUM IN SUPPORT OF ITS MOTION TO COMPEL DEFENDANT
GOOGLE, INC.'S CUSTODIAL DOCUMENT PRODUCTION**

PLEASE TAKE NOTICE THAT Plaintiff I/P Engine, Inc. (“I/P Engine”), pursuant to Rule 5 of the Local Rules of Practice for the U.S. District Court for the Eastern District of Virginia, have moved the court for leave to file under seal certain of I/P Engine’s Exhibits to its Memorandum in Support of its Motion to Compel Defendant Google Inc.’s Custodial Document Production. Grounds and authorities for this Motion are set forth in I/P Engine’s Memorandum in Support of Motion to Seal. Exhibits 15, 16, 17, 18, and 21 contain information marked as confidential by Defendants and, under the Protective Order (D.I. No. 85), should be filed under seal. The information contained in these exhibits contain Google’s proprietary and confidential information.

Before this Court may seal Court documents, it must (1) provide public notice with an opportunity to object; (2) consider less drastic alternatives; and (3) state specific findings in support of a decision to seal and reject alternatives to sealing. *See, e.g., Flexible Benefits*

Council v. Feldman, No. 1:08-CV-371, 2008 U.S. Dist. LEXIS 93039 (E.D. Va. Nov 13, 2008) (citing *Ashcroft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000)).

In compliance with Local Rule 5 of the Rules of this Court, the Court posts the following notice to the public: “This serves as public notice that I/P Engine has moved to file under seal Exhibits 15, 16, 17, 18, and 21. Objections to this Motion should be filed in the Civil Section of the Clerk’s Office. The Notice will be posted for a minimum of forty-eight (48) hours.”

Dated: April 11, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April, 2012, the foregoing **NOTICE OF MOTION TO SEAL EXHIBITS 15, 16, 17, 18, AND 21 OF I/P ENGINE'S MEMORANDUM IN SUPPORT OF ITS MOTION TO COMPEL DEFENDANT GOOGLE, INC.'S CUSTODIAL DOCUMENT PRODUCTION**, was served via the Court's CM/ECF system, on the following:

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