

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

I/P ENGINE, INC.,

Plaintiff,

v.

AOL, INC. et al.,

Defendants.

Civ. Action No. 2:11-cv-512

**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**

Pursuant to Local Rule 5 and the Agreed Protective Order entered by the Court [Dkt. No. 85], Plaintiff I/P Engine, Inc. (“I/P Engine”) respectfully moves this Court for entry of the attached Order permitting Defendants 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. In compliance with Local Rule 5, I/P Engine attaches a Proposed Agreed Order as Exhibit 1 and is filing separately a Public Notice of I/P Engine’s Motion to Seal. I/P Engine requests 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. The parties have agreed that confidential materials should be filed under seal.

Dated: April 11, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of April, 2012, the foregoing **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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