

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.	)	
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**MOTION TO SEAL I/P ENGINE’S OPPOSITION TO GOOGLE AND IAC’S MOTION TO COMPEL PLAINTIFF TO SUPPLEMENT ITS INFRINGEMENT CONTENTIONS ALONG WITH EXHIBITS 11, 12, 14, 15, 18, 21 AND 22 IN SUPPORT**

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 Plaintiff to file under seal its Opposition to Google and IAC’s Motion to Compel Plaintiff to Supplement its Infringement Contentions along with Exhibits 11, 12, 14, 15, 18, 21, and 22 in support. 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 12, 2012

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Counsel for Plaintiff I/P Engine, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of April, 2012, the foregoing **MOTION TO SEAL I/P ENGINE'S OPPOSITION TO GOOGLE AND IAC'S MOTION TO COMPEL PLAINTIFF TO SUPPLEMENT ITS INFRINGEMENT CONTENTIONS ALONG WITH EXHIBITS 11, 12, 14, 15, 18, 21 AND 22 IN SUPPORT**, was served via the Court's CM/ECF system, on the following:

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/s/ Jeffrey K. Sherwood \_\_\_\_\_