

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 REPLY BRIEF IN SUPPORT OF MOTION TO
COMPEL AND EXHIBITS AA AND BB TO THE DECLARATION OF EMILY C.
O'BRIEN IN SUPPORT OF THE REPLY**

Pursuant to Local Rule 5 and the Agreed Protective Order entered by the Court [Dkt. No. 85], Defendants Google, Inc. and IAC Search & Media, Inc. (collectively, "Defendants"), respectfully move this Court for entry of the attached Order permitting Defendants to file under seal Portions of Defendants' Reply Brief in Support of Motion to Compel ("Portions of Defendants' Reply Brief") and Exhibits AA and BB to the Declaration of Emily C. O'Brien in Support of the Reply ("Certain Exhibits to O'Brien Declaration"). Grounds and authorities for this Motion are set forth in Defendants' Memorandum in Support of Motion to Seal. 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: April 19, 2012

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2012, 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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