

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 GOOGLE INC.'S OPPOSITION TO PLAINTIFF'S  
MOTION TO COMPEL PRODUCTION OF CUSTODIAL DOCUMENTS; PORTIONS  
OF THE DECLARATION OF KRISTIN ZMRHAL IN SUPPORT OF GOOGLE INC.'S  
OPPOSITION TO PLAINTIFF'S MOTION TO COMPEL PRODUCTION OF  
CUSTODIAL DOCUMENTS; AND EXHIBITS H, O, Q, R, S AND U TO THE  
DECLARATION OF EMILY C. O'BRIEN IN SUPPORT OF OPPOSITION**

Pursuant to Local Rule 5 and the Agreed Protective Order entered by the Court [Dkt. No. 85], Defendant Google, Inc. ("Google"), respectfully moves this Court for entry of the attached Order permitting Google to file under seal (1) Portions of Google Inc.'s Opposition to Plaintiff's Motion to Compel Production of Custodial Documents ("Portions of Google's Opposition"); (2) Portions of the Declaration of Kristin Zmrhal in Support of Google Inc.'s Opposition to Plaintiff's Motion to Compel Production of Custodial Documents ("Portions of the Zmrhal Declaration"); and (3) Exhibits H, O, Q, R, S and U to the Declaration of Emily C. O'Brien in Support of Google Inc.'s Opposition to Plaintiff's Motion to Compel Production of Custodial Documents ("Certain Exhibits to the O'Brien Declaration"). Grounds and authorities for this Motion are set forth in Defendant's Memorandum in Support of Motion to Seal. In compliance with Local Rule 5, Defendant attaches a Proposed Order as **Exhibit 1** and is filing separately a

Public Notice of Defendant's Motion to Seal. Defendant requests that the Court retain sealed materials until forty-five (45) days after a final order is entered and requests that, unless the case is appealed, any sealed materials be returned to counsel for the filing parties.

DATED: April 20, 2012

/s/ Stephen E. Noona

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 20, 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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