

**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 BRIEF IN SUPPORT OF  
MOTION TO COMPEL AND VARIOUS EXHIBITS TO THE DECLARATION OF JEN  
GHAUSSY I N SUPPORT THEREOF**

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 Brief in Support of Motion to Compel (“Portions of Google’s Brief to Compel”) and (2) Exhibits A-C, H-N, P-U to the Declaration of Jen Ghaussy in Support of Google Inc.’s Motion to Compel (“Certain Exhibits to the Ghaussy 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: August 14, 2012

/s/ Stephen E. Noona

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 14, 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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