

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

**NOTICE OF MOTION TO SEAL PORTIONS OF GOOGLE INC.'S REPLY BRIEF IN
SUPPORT OF GOOGLE'S MOTION TO COMPEL PLAINTIFF TO PRODUCE
DOCUMENTS**

PLEASE TAKE NOTICE THAT Defendant Google Inc. ("Google"), by counsel, pursuant to Rule 5 of the Local Rules of Practice for the United States District Court for the Eastern District of Virginia and the Protective Order [Dkt. No. 85] entered in this matter, has moved the Court for leave to file under seal Portions of Google Inc.'s Reply Brief in Support of Google's Motion to Compel Plaintiff to Produce Documents ("Google's Reply Brief"). Grounds and authorities for this Motion are set forth in Google's Memorandum in Support of Motion to Seal. Google's Reply Brief contains confidential information and, under the Protective Order (Dkt. No. 85), should be filed under seal.

Before this Court may seal Court documents, it must: (1) provide public notice with an opportunity to object; (2) consider less drastic alternatives; and (3) state specific findings in support of a decision to seal and reject alternatives to sealing. *See, e.g., Flexible Benefits Council v. Feldman*, No. 1:08-CV-371, 2008 U.S. Dist. LEXIS 93039 (E.D. Va. Nov. 13, 2008) (citing *Ashcroft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000)).

In compliance with Local Rule 5 of the Rules of this Court and *Ashcroft*, the Court posts the following notice to the public: “This serves as public notice that Google has moved to file under seal Google’s Reply Brief. Objections to this Motion should be filed in the Civil Section of the Clerk’s Office. The Notice will be posted for a minimum of forty-eight (48) hours.”

DATED: September 4, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on September 4, 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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