

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 MEMORANDUM IN SUPPORT OF SECOND
MOTION FOR DISCOVERY SANCTIONS REGARDING UNTIMELY DISCOVERY
RESPONSES ALONG WITH EXHIBITS 2, 4, 5, 7, 8, 9, 13 AND 14 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 Memorandum in Support its Second Motion for Discovery Sanctions Regarding Untimely Discovery Responses along with Exhibits 2, 4, 5, 7, 8, 9, 13, and 14 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: September 21, 2012

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Counsel for Plaintiff I/P Engine, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of September, 2012, the foregoing **MOTION TO SEAL I/P ENGINE'S MEMORANDUM IN SUPPORT OF SECOND MOTION FOR DISCOVERY SANCTIONS REGARDING UNTIMELY DISCOVERY RESPONSES ALONG WITH EXHIBITS 2, 4, 5, 7, 8, 9, 13 AND 14 IN SUPPORT**, was served via the Court's CM/ECF system and via Hand Delivery, on the following:

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