

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 MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION TO EXCLUDE TESTIMONY FROM STEPHEN L. BECKER
AND CERTAIN MATERIALS FILED IN SUPPORT THEREOF**

Pursuant to Local Rule 5 and the Agreed Protective Order entered by the Court [Dkt. No. 85], Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., Gannett Co., Inc. and AOL Inc. (collectively "Defendants"), respectfully move this Court for entry of the attached Order permitting Defendants to file under seal: (1) Portions of Defendants' Memorandum in Support of Their Motion to Exclude Testimony of Stephen L. Becker ("Portions of Defendants' Motion to Exclude Becker"), (2) Portions of Exhibits 1 through 15 to the Declaration of Emily O'Brien in Support of the Defendants' Motion to Exclude Becker ("Portions of Exhibits 1-15 to the O'Brien Declaration"), (3) Portions of the Declaration of Nicholas Fox in Support of Defendants' Motion to Exclude Becker ("Portions of the Fox Declaration"), and (4) Portions of the Declaration of Bartholomew Furrow in Support of Defendants' Motion to Exclude Becker ("Portions of the Furrow Declaration"). Grounds and authorities for this Motion *along with specific grounds to support each sealing 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: September 21, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on September 21, 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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