

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 PRECLUDE DR. OPHIR FRIEDER FROM  
TESTIFYING REGARDING UNTIMELY OPINIONS THAT WERE NOT DISCLOSED  
IN HIS ORIGINAL EXPERT REPORT AND OPINIONS THAT HE NOW CONCEDES  
ARE INCORRECT 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 Memorandum in Support of Defendants' Motion to Preclude Testimony Dr. Ophir Frieder From Testifying Regarding Untimely Opinions That Were Not Disclosed In His Original Expert Report and Opinions That He Now Concedes Are Incorrect ("Portions of Defendants' Motion to Preclude Frieder") and (2) Exhibits A, B, G, and H to the Declaration of Jen Ghaussy in Support of the Defendants' Motion to Preclude Frieder ("Exhibits A, B, G, and H to the Ghaussy 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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