

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 THE DECLARATION OF MICHAEL HOCHBERG  
IN SUPPORT OF PLAINTIFF'S AND DEFENDANTS' MOTIONS TO SEAL**

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 Portions of the Declaration of Michael Hochberg in Support of Plaintiff's and Defendants' Motions to Seal ("Portions of the Hochberg 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 24, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 24, 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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