

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

**DEFENDANTS' MOTION TO SEAL DOCUMENTS AND CLOSE THE COURTROOM
DURING PRESENTATION OF CONFIDENTIAL MATERIAL AT TRIAL**

Defendants respectfully file this Motion to Seal Documents and Close the Courtroom During Presentation of Confidential Material at Trial. The grounds and authorities in support of this Motion are set forth in Defendants' Memorandum In Support of Motion to Seal Documents and Close the Courtroom During Presentation of Confidential Material at Trial, and the Declarations of Michael Hochberg, Danielle Romain, and James Maccoun as well as the Declaration of Margaret P. Kammerud, with exhibit, filed in connection with this Motion. A proposed order is attached hereto as **Exhibit 1**.

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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