UNITED STATES DISTRICT COURT EASTERN DISTRICT OF VIRGINIA NORFOLK DIVISION

I/P ENGINE, INC.,)	
v.	Plaintiff,)	Civ. Action No. 2:11-cv-512
AOL, INC. et al.,)	
	Defendants.))	

MOTION TO SEAL I/P ENGINE'S I/P ENGINE, INC.'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT ALONG WITH EXHIBITS 2-8, 11-19, 22-24, 27-32, 34-39, 45, 53-54, 56

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 Opposition to Defendant's Motion for Summary Judgment along with Exhibits 8, 11-19, 22-24, 27-32, 34-39, 45, 53-54, 56. 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 26, 2012 By: /s/ Jeffrey K. Sherwood

Donald C. Schultz (Virginia Bar No. 30531) W. Ryan Snow (Virginia Bar No. 47423) CRENSHAW, WARE & MARTIN PLC 150 West Main Street Norfolk, VA 23510

Telephone: (757) 623-3000 Facsimile: (757) 623-5735

Jeffrey K. Sherwood (Virginia Bar No. 19222) Frank C. Cimino, Jr. Kenneth W. Brothers DeAnna Allen Charles J. Monterio, Jr. DICKSTEIN SHAPIRO LLP 1825 Eye Street, NW Washington, DC 20006

Telephone: (202) 420-2200 Facsimile: (202) 420-2201

Counsel for Plaintiff I/P Engine, Inc.

2

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of September, 2012, the foregoing

MOTION TO SEAL I/P ENGINE'S I/P ENGINE, INC.'S OPPOSITION TO

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT ALONG WITH EXHIBITS 2-

8, 11-19, 22-24, 27-32, 34-39, 45, 53-54, 56, was served via the Court's CM/ECF system and via

Hand Delivery, on the following:

Stephen Edward Noona Kaufman & Canoles, P.C. 150 W Main St Suite 2100 Norfolk, VA 23510 senoona@kaufcan.com

David Bilsker
David Perlson
Quinn Emanuel Urquhart & Sullivan LLP
50 California Street, 22nd Floor
San Francisco, CA 94111
davidbilsker@quinnemanuel.com
davidperlson@quinnemanuel.com

Robert L. Burns
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
Two Freedom Square
11955 Freedom Drive
Reston, VA 20190
robert.burns@finnegan.com

Cortney S. Alexander
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
3500 SunTrust Plaza
303 Peachtree Street, NE
Atlanta, GA 94111
cortney.alexander@finnegan.com

/s/ Jeffrey K. Sherwood