

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: (1) PORTIONS OF DEFENDANTS' OPPOSITION TO PLAINTIFF I/P ENGINE'S FIRST MOTION IN LIMINE TO EXCLUDE INADMISSIBLE EVIDENCE, (2) PORTIONS OF DEFENDANTS' OPPOSITION TO PLAINTIFF I/P ENGINE'S SECOND MOTION IN LIMINE TO PRECLUDE LICENSE AGREEMENTS, AND (3) EXHIBITS E AND K TO THE DECLARATION OF MARGARET P. KAMMERUD IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S MOTIONS IN LIMINE**

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' Opposition to Plaintiff I/P Engine's First Motion in Limine to Exclude Inadmissible Evidence ("Portions of Defendants' Opposition to Plaintiff's First Motion in Limine"); (2) Portions of Defendants' Opposition to Plaintiff I/P Engine's Second Motion in Limine to Preclude License Agreements ("Portions of Defendants' Opposition to Plaintiff's Second Motion in Limine"); and (3) Exhibits E and K to the Declaration of Margaret P. Kammerud in Support of Defendants' Opposition to Plaintiff's Motions in Limine ("Exhibits E and K to the Kammerud 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 27, 2012

/s/ Stephen E. Noona

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 27, 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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