

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

I/P ENGINE, INC.,

Plaintiff,

v.

AOL, INC. et al.,

Defendants.

Civ. Action No. 2:11-cv-512

**MOTION TO SEAL OPPOSITION TO DEFENDANT’S MOTION IN LIMINE #5 TO
PRECLUDE PLAINTIFF FROM INTRODUCING EVIDENCE OF DAMAGES
AGAINST AOL INC., GANNETT CO., INC., IAC SEARCH & MEDIA, INC., AND
TARGET CORPORATION ALONG WITH EXHIBITS 1 AND 2**

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 in Limine #5 to Preclude Plaintiff from Introducing Evidence of Damages Against AOL Inc., Gannett Co., Inc. IAC Search & Media, Inc., and Target Corporation along with Exhibits 1 and 2. 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 27, 2012

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Counsel for Plaintiff I/P Engine, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2012, the foregoing
**MOTION TO SEAL OPPOSITION TO DEFENDANT’S MOTION IN LIMINE #5 TO
PRECLUDE PLAINTIFF FROM INTRODUCING EVIDENCE OF DAMAGES
AGAINST AOL INC., GANNETT CO., INC., IAC SEARCH & MEDIA, INC., AND
TARGET CORPORATION ALONG WITH EXHIBITS 1 AND 2**, was served via the
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