

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
NORFOLK DIVISION

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I/P ENGINE, INC.,		)	
		)	
	Plaintiff,	)	
	v.	)	Civ. Action No. 2:11-cv-512
		)	
AOL, INC. et al.,		)	
		)	
	Defendants.	)	
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**MOTION TO SEAL PLAINTIFF I/P ENGINE, INC.’S OPPOSITION TO  
DEFENDANTS’ MOTION TO PRECLUDE DR. FRIEDER FROM TESTIFYING  
REGARDING “UNTIMELY” OPINIONS ALONG WITH EXHIBITS 1-3 AND 5**

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 Defendants’ Motion to Preclude Dr. Frieder from Testifying Regarding “Untimely” Opinions along with Exhibits 1-3 and 5. 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 PLAINTIFF I/P ENGINE, INC.'S OPPOSITION TO  
DEFENDANTS' MOTION TO PRECLUDE DR. FRIEDER FROM TESTIFYING  
REGARDING "UNTIMELY" OPINIONS ALONG WITH EXHIBITS 1-3 AND 5,** was  
served via the Court's CM/ECF system, on the following:

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/s/ Jeffrey K. Sherwood \_\_\_\_\_