

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' MEMORANDUM IN OPPOSITION TO PLAINTIFF'S SECOND MOTION FOR DISCOVERY SANCTIONS (2) PORTIONS OF DEFENDANTS' MEMORANDUM IN OPPOSITION TO PLAINTIFF'S THIRD MOTION FOR DISCOVERY SANCTIONS (3) PORTIONS OF THE DECLARATION OF MARGARET KAMMERUD IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S THIRD MOTION FOR DISCOVERY SANCTIONS (4) PORTIONS OF EXHIBITS A-E, G, I-K TO THE DECLARATION OF JENNIFER GHAUSSY IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S SECOND MOTION FOR DISCOVERY SANCTIONS; AND (5) EXHIBITS L-Q TO THE DECLARATION OF MARGARET KAMMERUD IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF'S THIRD MOTION FOR DISCOVERY SANCTIONS

Pursuant to Local Rule 5 and the Agreed Protective Order entered in this matter on January 23, 2012 (Dk. 85) ("Protective Order"), Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., Gannet 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' Memorandum in Opposition to Plaintiff's Second Motion for Discovery Sanctions ("Opposition to Second Motion for Sanctions"); (2) Portions of Defendants' Memorandum in Opposition to Plaintiff's Third Motion for Discovery Sanctions ("Opposition to Third Motion for Sanctions"); (3) Portions of the Declaration of Margaret Kammerud in Support of Defendants' Opposition to Plaintiff's Third Motion for Discovery Sanctions ("Kammerud

Declaration"); (4) Portions of Exhibits A-E, G, I-K to the Declaration of Jennifer Ghaussy in Support of Defendants' Oppositions to Plaintiff's Second and Third Motions for Discovery Sanctions ("Exhibits A-E, G, I-K to Ghaussy Declaration"); and (5) Portions of Exhibits L-Q to Kammerud Declaration. Grounds and authorities for this Motion 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 requests that, unless the case is appealed, any sealed materials be returned to counsel for the filing parties.

DATED: October 1, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on October 1, 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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