

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 PORTIONS OF THE REPLY IN SUPPORT OF DEFENDANTS'
MOTION FOR SUMMARY JUDGMENT, AND EXHIBITS 34 AND 36 TO THE
DECLARATION OF JOSHUA L. SOHN IN SUPPORT OF DEFENDANTS' REPLY IN
SUPPORT OF DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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 Portions of the Reply in Support of Defendants' Motion for Summary Judgment ("Defendants' Reply in Support") and Exhibits 34 and 36 to the Declaration of Joshua L. Sohn in Support of the Reply in Support of Defendants' Motion for Summary Judgment ("Certain Exhibits to the Sohn 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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