

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 EXHIBIT 1 TO THE O'BRIEN DECLARATION IN  
SUPPORT OF DEFENDANTS' MOTION FOR SANCTIONS AND TO STRIKE  
PORTIONS OF DR. FRIEDER'S SECOND UPDATED EXPERT REPORT**

Pursuant to Local Rule 5 and the Agreed Protective Order entered in this matter on January 23, 2012 (Dkt. 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 Exhibit 1 to the O'Brien Declaration in Support of Defendants' Motion for Sanctions and to Strike Portions of Dr. Frieder's Second Updated Expert Report ("Portions of O'Brien Dec. Ex. 1"). 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 14, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 14, 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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