

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 SUPPORT OF RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW ON NON-INFRINGEMENT OR NEW TRIAL; (2) PORTIONS OF DEFENDANTS' MEMORANDUM IN SUPPORT OF RENEWED MOTION FOR JUDGMENT AS A MATTER OF LAW ON DAMAGES OR NEW TRIAL; AND (3) CERTAIN EXHIBIT TO THE DECLARATION OF JOSHUA L. SOHN IN SUPPORT OF DEFENDANTS' RENEWED MOTIONS FOR JUDGMENT AS A MATTER OF LAW ON DAMAGES, INVALIDITY AND NON-INFRINGEMENT OR NEW TRIAL

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 (1) Portions of Defendants' Memorandum in Support of Renewed Motion for Judgment as a Matter of Law on Non-Infringement or New Trial ("Memorandum in Support of Renewed JMOL on Non-Infringement"); (2) Portions of Defendants' Memorandum in Support of Renewed Motion for Judgment as a Matter of Law on Damages or New Trial ("Memorandum in Support of Renewed JMOL on Damages"); and (3) Certain Exhibit to the Declaration of Joshua L. Sohn in Support of Defendants' Renewed Motions for Judgment as a Matter of Law on

Damages, Invalidity and Non-Infringement or New Trial (“Exhibit 1 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: December 18, 2012

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CERTIFICATE OF SERVICE

I hereby certify that on December 18, 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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