

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 DEFENDANTS' MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S RULE 59 MOTION FOR A NEW TRIAL ON THE
DOLLAR AMOUNT OF DAMAGES AND EXHIBIT 2 TO THE DECLARATION OF
MARGARET P. KAMMERUD FILED IN SUPPORT THEREOF**

Pursuant to Local Rule 5 and the Agreed Protective Order entered in this matter on January 23, 2012 (Doc. No. 85) ("Protective Order"), Defendants Google Inc., Target Corporation, IAC Search & Media, Inc., Gannett 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 Defendants' Memorandum in Opposition to Plaintiff's Rule 59 Motion for a New Trial on the Dollar Amount of Damages ("Memorandum in Opposition to Rule 59 Motion") and Exhibit 2 to the Declaration of Margaret P. Kammerud filed in support of that Opposition ("Exhibit 2 to the 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 request that, unless the case is appealed, any sealed materials be returned to counsel for the filing parties.

DATED: January 25, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2013, 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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