

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

**NOTICE OF GOOGLE'S MOTION TO SEAL PORTIONS OF GOOGLE'S REPLY IN SUPPORT OF ITS MOTION TO COMPEL PLAINTIFF TO PROVIDE CONCEPTION, REDUCTION-TO-PRACTICE, AND PRIORITY DATE INFORMATION, AND EXHIBITS L, M, N AND P TO THE DECLARATION OF MARGARET KAMMERUD IN SUPPORT THEREOF**

PLEASE TAKE NOTICE THAT Google Inc. ("Google"), by counsel, pursuant to Rule 5 of the Local Rules of Practice for the United States District Court for the Eastern District of Virginia, has moved the Court for leave to file under seal portions of Google's Reply in Support of its Motion to Compel Plaintiff to Provide Conception, Reduction-to-Practice, and Priority Date Information for the Patents-in-Suit ("Portions of Google's Reply") and Exhibits L, M, N and P to the Declaration of Margaret Kammerud in Support of Google's Reply in Support of its Motion to compel Plaintiff to Provide Conception, Reduction-to-Practice, and Priority Date Information for the Patents-in-Suit ("Certain Exhibits to Kammerud Declaration"). Grounds and authorities for this Motion are set forth in Google's Memorandum in Support of Motion to Seal. Portions of Google's Reply and Certain Exhibits to Kammerud Declaration contain confidential information and, under the Protective Order (Dkt. No. 85), should be filed under seal.

Before this Court may seal Court documents, it must: (1) provide public notice with an opportunity to object; (2) consider less drastic alternatives; and (3) state specific findings in support of a decision to seal and reject alternatives to sealing. *See, e.g., Flexible Benefits Council v. Feldman*, No. 1:08-CV-371, 2008 U.S. Dist. LEXIS 93039 (E.D. Va. Nov. 13, 2008) (citing *Ashcroft v. Conoco, Inc.*, 218 F.3d 282, 288 (4<sup>th</sup> Cir. 2000)).

In compliance with Local Rule 5 of the Rules of this Court and *Ashcroft*, the Court posts the following notice to the public: “This serves as public notice that Google has moved to file under seal Portions of Google’s Reply and Certain Exhibits to Kammerud Declaration. Objections to this Motion should be filed in the Civil Section of the Clerk’s Office. The Notice will be posted for a minimum of forty-eight (48) hours.”

DATED: March 5, 2012

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 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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