

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION

_____)		
I/P ENGINE, INC.,)		
)	
Plaintiff,)		
v.)		Civ. Action No. 2:11-cv-512
)	
AOL, INC. et al.,)		
)	
Defendants.)		
_____)		

**MOTION TO SEAL I/P ENGINE, INC.’S NOTICE OF CALCULATION
OF SUPPLEMENTAL DAMAGES, PREJUDGMENT INTEREST AND
POST-JUDGMENT INTEREST**

Pursuant to Local Rule 5 and the Agreed Protective Order entered by the Court [Dkt. No. 85], Plaintiff I/P Engine, Inc. (“I/P Engine”) respectfully moves this Court for entry of the attached Order permitting Plaintiff to file under seal its Notice Of Calculation Of Supplemental Damages, Prejudgment Interest And Post-Judgment Interest. Grounds and authorities for this Motion are set forth in I/P Engine’s Memorandum in Support of Motion to Seal. In compliance with Local Rule 5, I/P Engine attaches a Proposed Agreed Order as Exhibit 1 and is filing separately a Public Notice of I/P Engine’s Motion to Seal. I/P Engine requests 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. The parties have agreed that confidential materials should be filed under seal.

Dated: August 21, 2013

By: /s/ Jeffrey K. Sherwood
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Counsel for Plaintiff I/P Engine, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of August, 2013, the foregoing **MOTION TO SEAL I/P ENGINE, INC.’S NOTICE OF CALCULATION OF SUPPLEMENTAL DAMAGES, PREJUDGMENT INTEREST AND POST-JUDGMENT INTEREST**, was served via the Court’s CM/ECF system, on the following:

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