

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) EXHIBIT 1 TO THE DECLARATION OF KEITH UGONE, PH.D., IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFF I/P ENGINE, INC.'S NOTICE OF CALCULATION OF SUPPLEMENTAL DAMAGES, PREJUDGMENT INTEREST AND POST-JUDGMENT INTEREST; AND (2) EXHIBIT B TO THE DECLARATION OF MARGARET P. KAMMERUD 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 (1) Exhibit 1 to the Declaration of Keith Ugone, Ph.D., in Support of Defendants' Opposition to Plaintiff I/P Engine, Inc.'s Notice of Calculation of Supplemental Damages, Prejudgment Interest and Post-Judgment Interest ("Exhibit 1 to the Ugone Declaration"), and (2) Exhibit B to the Declaration of Margaret Kammerud in Support of Defendants' Opposition to Plaintiff I/P Engine, Inc.'s Notice of Calculation of Supplemental Damages, Prejudgment Interest and Post-Judgment Interest ("Exhibit B to the Kammerud Declaration"). 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: August 26, 2013

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on August 26, 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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