

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 SUPPLEMENTAL MEMORANDUM
SETTING FORTH ADDITIONAL NEW FACTS JUSTIFYING ITS REQUEST FOR
DEFAULT JUDGMENT IN I/P ENGINE’S MOTION FOR DEFENDANTS TO SHOW
CAUSE UNDER RULE 37 FOR NONCOMPLIANCE WITH THE AUGUST 13, 2013
ORDER ALONG WITH EXHIBITS A AND C AND THE DECLARATION OF
CHARLES J. MONTERIO, JR. IN SUPPORT OF I/P ENGINE’S SUPPLEMENTAL
MEMORANDUM OF ADDITIONAL FACTS**

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 Supplemental Memorandum Setting Forth Additional New Facts Justifying Its Request For Default Judgment In I/P Engine’s Motion For Defendants To Show Cause Under Rule 37 For Noncompliance with the August 13, 2013 Order Along with Exhibits A and C and the Declaration of Charles J. Monterio, Jr. in Support of I/P Engine’s Supplemental Memorandum of Additional Facts. 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: October 7, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of October, 2013, the foregoing was served

via the Court's CM/ECF system, on the following:

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