

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Norfolk Division

FILED  
SEP 28 2012  
CLERK, US DISTRICT COURT  
NORFOLK, VA

I/P ENGINE, INC.  
  
Plaintiff,  
  
v.  
  
AOL, INC., *et al.*,  
  
Defendants.

Civil Action No. 2:11-cv-512

**██████████ AGREED ORDER TO MAINTAIN PORTIONS OF DOCUMENTS**  
**UNDER SEAL**

\*  
see  
addition  
to second  
page

On this day came Plaintiff I/P Engine, Inc. ("I/P Engine") and Defendants Google Inc. ("Google"), IAC Search & Media, Inc., Target, Corp., and Gannett Co., Inc., ("Defendants"), jointly and by counsel, upon the Notice of Filing of Certain Unsealed and Further Sealed Materials in Response to Order to Show Cause, and, upon consideration of the arguments set forth in the Notice, and for good cause shown, it is

ORDERED that the following document be maintained under seal in full:

ECF No. 125 – Exhibits 14, 18 and 21 to the Plaintiff's Motion to Seal.

ECF Nos. 234-41 – Exhibits 9 and 25 to the Declaration of Howard Chen in Support of Defendants' Motion for Summary Judgment.

It is further ORDERED that portions of the following documents be maintained under seal in connection with the motions they support:

ECF No. 115 – Exhibits 15, 16, 17, and 21 to the Plaintiff's Motion to Seal.

**ECF No. 125** – Exhibits 11, 12, 15, and 22 to Plaintiff's Motion to Seal, and I/P Engine's Brief in Opposition to Google, and IAC's Motion to Compel Plaintiff to Supplement Its Infringement Contentions.

**ECF No. 136** – Exhibits AA and BB to Defendants' Motion to Seal, and the Reply Brief in Support of Motion to Compel.

**ECF No. 181** – Exhibit P to the Declaration of Jennifer Ghaussy in Support of Defendants' Opposition to Plaintiff's Motion for Leave to Take 30(b)(1) Depositions.

**ECF No. 206** – Exhibits A, B, C, J, K, and the Brief in Support of Defendants' Motion to Compel.

**ECF No. 214** – Exhibits M and N to the Declaration of Emily O'Brien in Support of the Motion to Seal Portions of Defendants Brief in Opposition to Plaintiff's Motion for Discovery Sanctions, and the Brief in Opposition to Plaintiff's Motion for Sanctions.

**ECF Nos. 234-41** – Exhibits 4, 5, 6, 7, 8, 9, 21, 22, 26, 27, 28, 29, and 30 to the Declaration of Howard Chen in Support of Defendants' Motion for Summary Judgment, the Declaration of Bartholomew Furrow in Support of Defendants' Motion for Summary Judgment, and the Memorandum in Support of Defendants' Motion for Summary Judgment.

It is further ORDERED that the following documents be unsealed in connection with the motions they support:

**ECF No. 115** – Exhibit 18 to the Plaintiff's Motion to Seal.

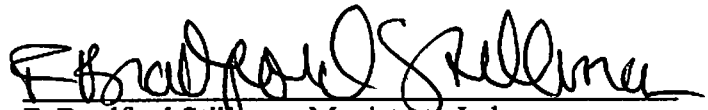
**ECF No. 206** – Exhibits H, I, L, M, N, P, Q, R, S, T, and U.

**ECF No. 226** – The Reply Brief in Support of the Motion to Compel.

**ECF Nos. 234-41** – Exhibit 31 to the Declaration of Howard Chen in Support of Defendants' Motion for Summary Judgment.

Dated: September 28, 2012

Entered: 9 / 28 / 2012



F. Bradford Stillman, Magistrate Judge  
United States District Court  
Eastern District of Virginia

\* The parties are DIRECTED to file their Joint Response to the Orders to Show Cause and non-confidential exhibits, proffered in camera on September 24, 2012, via CM/ECF within five days of the date of this Order.

**WE ASK FOR THIS:**

DATED: September 24, 2012

/s/ Stephen E. Noona

Stephen E. Noona  
Virginia State Bar No. 25367  
KAUFMAN & CANOLES, P.C.  
150 West Main Street, Suite 2100  
Norfolk, VA 23510  
Telephone: (757) 624.3000  
Facsimile: (757) 624.3169  
senoona@kaufcan.com

David Bilsker  
David A. Perlson  
QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
50 California Street, 22nd Floor  
San Francisco, California 94111  
Telephone: (415) 875-6600  
Facsimile: (415) 875-6700  
davidbilsker@quinnemanuel.com  
davidperlson@quinnemanuel.com

*Counsel for Defendants GOOGLE INC., IAC SEARCH  
& MEDIA, INC., TARGET CORP., and GANNETT  
COMPANY, INC.*

/s/ Donald C. Schultz

Donald C. Schultz  
W. Ryan Snow  
Steven Stancliff  
CRENSHAW, WARE & MARTIN, P.L.C.  
150 West Main Street, Suite 1500  
Norfolk, VA 23510  
Telephone: (757) 623-3000  
Facsimile: (757) 623-5735  
dschultz@cwm-law.cm  
wrsnow@cwm-law.com  
sstancliff@cwm-law.com

Jeffrey K. Sherwood  
Kenneth W. Brothers  
DICKSTEIN SHAPIRO LLP  
1825 Eye Street NW  
Washington, DC 20006  
Telephone: (202) 420-2200  
Facsimile: (202) 420-2201

sherwoodj@dicksteinshapiro.com  
brothersk@dicksteinshapiro.com

*Counsel for Plaintiff I/P Engine, Inc.*