

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

**JOINT MOTION AND MEMORANDUM IN SUPPORT OF JOINT MOTION FOR AN
EXTENSION OF TIME TO RESPOND TO THE COURT'S ORDER ON
OUTSTANDING MOTIONS TO SEAL**

Defendants AOL Inc. ("AOL"), IAC Search & Media, Inc. ("IAC"), Gannett Co., Inc. ("Gannett"), Target Corporation ("Target"), and Google Inc. ("Google") (collectively "Defendants"), and Plaintiff, I/P Engine, Inc. ("I/P Engine"), by counsel, jointly move this Court for entry of an order granting the parties an extension of time to respond to the Court's February 7, 2013 Order Regarding Outstanding Motions to Seal Case Documents (Dkt. No. 886) ("Court's Order on Outstanding Motions to Seal"), and in support thereof state as follows:

1. On February 7, 2013, the Court entered its Order on Outstanding Motions to Seal and directed the parties within seven (7) days to:

- "undertake an assessment of the outstanding motions to seal case records and provide the names and document numbers of motions to seal that are now moot, withdrawn, or that should otherwise be dismissed;"

- “submit a proposed order disposing of any outstanding motions to seal that are moot, withdrawn or otherwise should be dismissed;” and
- “[a]ffirmatively identify, by name and document number, which outstanding motions to seal still need to be resolved by the Court.”

2. Having reviewed the docket, the parties have found a minimum of *thirty five (35) unresolved motions to seal* and have begun reviewing those motions and the documents referenced therein to determine if any motions may be dismissed and whether any documents can be withdrawn, further redacted or made public. In addition, as directed by the Order, the parties are coordinating their efforts. Unfortunately, given the volume of unresolved motions and proposed sealed documents, the parties need additional time to complete their review. As a result, the parties request that this Court grant them leave through February 28, 2013 to respond to the Court’s Order on Outstanding Motions to Seal.

3. Granting the requested extension will not prejudice the Court or the parties and will allow a more orderly disposition of the Outstanding Motions to Seal.

4. Attached as **Exhibit 1** is a proposed agreed order granting the jointly requested extension. The parties will deliver an endorsed agreed order granting the requested relief to the Court by hand for consideration.

WHEREFORE, the parties, by counsel, jointly request that this Court enter the proposed agreed order attached as **Exhibit 1** granting the parties through and including February 28, 2013 to respond to the Court’s Order on Outstanding Motions to Seal.

Dated: February 12, 2013

Respectfully submitted,

/s/ Stephen E. Noona

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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 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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