

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) PORTIONS OF DEFENDANTS' MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S MOTION FOR POST-JUDGMENT ROYALTIES, (2)
PORTIONS OF THE DECLARATION OF KEITH UGONE, PH.D., IN SUPPORT OF
DEFENDANTS' OPPOSITION, (3) CERTAIN EXHIBITS TO THE DECLARATION OF
MARGARET KAMMERUD IN SUPPORT OF DEFENDANTS' OPPOSITION, AND (4)
PORTIONS OF THE DECLARATION OF BARTHOLOMEW FURROW IN SUPPORT
OF DEFENDANTS' OPPOSITION**

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) Portions of Defendants' Memorandum In Opposition To Plaintiff's Motion For Post-Judgment Royalties ("Portions of Defendants' Opposition"), (2) Portions of the Declaration of Keith Ugone, Ph.D. ("Ugone Declaration and Certain Exhibits Thereto"), (3) Exhibits 2-21 to the Declaration of Margaret Kammerud ("Certain Exhibits to the Kammerud Declaration") and (4) Portions of the Declaration of Bartholomew Furrow in Support of Defendants' Opposition ("Furrow 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: May 13, 2013

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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 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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