

1 Forrest A. Hainline III (SBN 64166)  
 2 *fhainline@goodwinprocter.com*  
 3 Hong-An Vu (SBN 266268)  
 4 *hvu@goodwinprocter.com*  
 5 **GOODWIN PROCTER LLP**  
 6 Three Embarcadero Center  
 7 24th Floor  
 8 San Francisco, California 94111  
 9 Tel.: 415.733.6000  
 10 Fax.: 415.677.9041

11 Michael T. Jones (SBN 290660)  
 12 *mjones@goodwinprocter.com*  
 13 **GOODWIN PROCTER LLP**  
 14 135 Commonwealth Drive  
 15 Menlo Park, California 94025-1105  
 16 Tel.: 650.752.3100  
 17 Fax.: 650.853.1038

18 Brian W. Cook (*Pro Hac Vice*)  
 19 *bcook@goodwinprocter.com*  
 20 **GOODWIN PROCTER LLP**  
 21 53 State Street  
 22 Boston, MA 02109-2802  
 23 Tel.: 617.570.1000  
 24 Fax.: 617.523.1231

25 *Attorneys for Defendant*  
 26 **ROCKET LAWYER INCORPORATED**

27 **UNITED STATES DISTRICT COURT**  
 28 **CENTRAL DISTRICT OF CALIFORNIA**  
**WESTERN DIVISION**

19 LEGALZOOM.COM, INC., a Delaware  
 20 corporation,  
 21 Plaintiff,  
 22 v.  
 23 ROCKET LAWYER  
 24 INCORPORATED, a Delaware  
 25 corporation,  
 26 Defendant.

Case No. 2:12-cv-09942-GAF-AGR

**JOINT STIPULATION TO  
 CONTINUE SUMMARY  
 JUDGMENT HEARING AND CASE  
 DEADLINES FOR MEDIATION**

Judge: Judge Gary A. Feess  
 Courtroom: 740  
 255 East Temple Street  
 Los Angeles, CA 90012  
 Action Filed: November 20, 2012

1           LegalZoom.com Inc. and Rocket Lawyer Incorporated agree and stipulate as  
2 follows:

3           1.       LegalZoom filed its original Complaint on November 20, 2012.

4           2.       On or about April 9, 2013, the parties agreed to mediate the case and  
5 agreed to stay all discovery deadlines pending mediation.

6           3.       Beginning in April 2013 and continuing up to August 22, 2013, the  
7 parties engaged in good faith efforts to mediate and settle this action with the  
8 assistance of a mediator, Hon. William J. Cahill (Ret.). On August 22, 2013, after a  
9 final exchange of settlement demands, the parties decided to terminate the mediation  
10 effort. Discovery remained stayed throughout the negotiation period.

11          4.       On October 6, 2013, the Court entered an order granting the parties'  
12 joint stipulation to continue the trial and discovery dates set in the Court's April 11,  
13 2013 Scheduling Order. As a result, the discovery cut-off for this case was set for  
14 April 7, 2014.

15          5.       On January 22, 2014, the Court entered an order granting the parties'  
16 joint stipulation to continue the trial and discovery dates set in the Court's October  
17 6, 2013 Scheduling Order. As a result, the discovery cut-off for this case was set for  
18 June 24, 2014.

19          6.       On April 15, 2014, the Court entered an order granting LegalZoom's ex  
20 parte application to continue the trial and related dates set in the Court's January 22,  
21 2014 Scheduling Order. As a result, the discovery cut-off for this case was set for  
22 August 12, 2014.

23          7.       On July 29, 2014, the Court entered an order granting the parties' joint  
24 stipulation to take certain depositions after the discovery cut-off.

25          8.       During that same week, the parties began to discuss mediation.

26          9.       On August 4, 2014, the parties completed all briefing relating to the  
27 cross-motions for summary judgment currently scheduled to be heard on August 18,  
28 2014.

1           10.     Also on August 4, 2014, the parties agreed to renew mediation before  
2 Judge Cahill subject to the following restrictions:

3           (a)     Mediation will occur within thirty (30) days of an order granting  
4 this stipulation in San Francisco, California, subject to Judge Cahill's availability.

5           (b)     The hearing and ruling on the cross-motions for summary  
6 judgment shall be continued to a date certain within two weeks of the scheduled  
7 mediation.

8           (c)     The parties will notify the Court of the hearing date once the  
9 mediation is scheduled.

10          (d)     The parties agree to postpone all case deadlines, except for the  
11 discovery and motion cut-off dates, by approximately sixty (60) days, subject to the  
12 Court's approval.

13          (e)     The parties shall identify their respective representatives who  
14 will attend the mediation at least fourteen (14) days before the mediation and  
15 confirm that those individuals have settlement authority.

16          (f)     The parties shall provide a copy of all the summary judgment  
17 briefing to Judge Cahill as context for the mediation.

18          (g)     The parties shall provide mediation statements in letter brief  
19 format not to exceed five (5) pages in length.

20          (h)     All depositions permitted by the Court to be taken after the  
21 discovery cut-off shall be continued until after the mediation. Should mediation fail,  
22 these depositions will be taken within 30 days after such failure.

23           NOW, WHEREFORE, the parties stipulate and agree, subject to the Court's  
24 approval:

- 25           • To attend mediation within thirty (30) days of a Court order granting this  
26 stipulation in accordance with the conditions agreed to by the parties  
27 subject to Judge Cahill's availability.

28

- To continue the August 18, 2014 hearing on the cross-motions for summary judgment to a date two weeks after the date for mediation. Within a reasonable time after agreeing on a mediation date, the parties shall file amended notices of their respective motions for summary judgment.
- To revise the current case deadlines pending mediation as follows:

<b>Matter</b>	<b>Current Deadline</b>	<b>Weeks before trial</b>	<b>Proposed New Deadline</b>
Trial Estimated length: 4-5 days	October 21, 2014 8:30 a.m.		December 9, 2014
Hearing on Motions in Limine; Hearing on Disputed Jury Instructions	October 6, 2014	-1	December 2, 2014
File Findings of Fact and Conclusions of Law; Hearing on Motions in Limine	October 6, 2014	-1	December 2, 2014
Pretrial Conference; Motions in Limine to be filed; Proposed Voir Dire Qs Lodged and Agreed-to Statement of Case	September 22, 2014	-4	November 11, 2014
Lodge Pretrial Conf. Order; File Memo of Contentions of Fact and Law; Exhibit & Witness Lists; File Status Report re Settlement; File Agreed Upon Set of Jury Instructions and Verdict Forms; File Joint Statement re Disputed Instructions, Verdicts, etc.	September 9, 2014	-6	October 28, 2014
Last date to conduct Settlement Conference	August 26, 2014	-8	October 14, 2014
Last day for hearing motions <i>Except hearing on the parties' already submitted cross-motion for summary judgment.</i>	August 18, 2014	-9	August 18, 2014

Matter	Current Deadline	Weeks before trial	Proposed New Deadline
Discovery cut-off <i>Excluding permitted depositions, if necessary, to be taken within 30 days after mediation fails.</i>	August 12, 2014	-10	August 12, 2014

Dated: August 5, 2014

Respectfully submitted,

By: /s/ Hong-An Vu

Forrest A. Hainline III  
*fhainline@goodwinprocter.com*  
 Hong-An Vu (SBN 266268)  
*hvu@goodwinprocter.com*  
 Michael T. Jones (SBN 290660)  
*mjones@goodwinprocter.com*  
 Brian W. Cook (*Pro Hac Vice*)  
*bcook@goodwinprocter.com*  
**GOODWIN PROCTER LLP**  
 Three Embarcadero Center  
 24th Floor  
 San Francisco, California 94111  
 Tel.: 415.733.6000  
 Fax.: 415.677.9041

*Attorneys for Defendant*  
**ROCKET LAWYER INCORPORATED**

Dated: August 5, 2014

By: /s/ Aaron P. Allan (with permission)

Patricia L. Glaser  
*pglaser@glaserweil.com*  
 Fred D. Heather  
*fheather@glaserweil.com*  
 Aaron P. Allan  
*aallan@glaserweil.com*  
**GLASER WEIL FINK JACOBS  
 HOWARD AVCHEN & SHAPIRO  
 LLP**  
 10250 Constellation Boulevard,  
 19th Floor  
 Los Angeles, California 90067  
 Tel.: (310) 553-3000  
 Fax.: (310) 556-2920

*Attorneys for Plaintiff*  
**LEGALZOOM.COM, INC.**