

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

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6 Michael T. Jones (SBN 290660)
 mjones@goodwinprocter.com
 7 **GOODWIN PROCTER LLP**
 135 Commonwealth Drive
 8 Menlo Park, California 94025-1105
 9 Tel.: 650.752.3100
 Fax.: 650.853.1038

10 Brian W. Cook (*Pro Hac Vice*)
 11 bcook@goodwinprocter.com
 12 **GOODWIN PROCTER LLP**
 53 State Street
 13 Boston, MA 02109-2802
 Tel.: 617.570.1000
 Fax.: 617.523.1231

14 *Attorneys for Defendant*
 15 **ROCKET LAWYER INCORPORATED**

16 **UNITED STATES DISTRICT COURT**
 17 **CENTRAL DISTRICT OF CALIFORNIA**
 18 **WESTERN DIVISION**

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

Case No. 2:12-cv-09942-GAF-AGR
**APPLICATION FOR AN ORDER
 GRANTING LEAVE TO FILE
 DOCUMENTS UNDER SEAL**
 Date: August 18, 2014
 Time: 9:30 a.m.
 Judge: Judge Gary A. Feess
 Courtroom: 740
 255 East Temple Street
 Los Angeles, CA 90012
 Action Filed: November 20, 2012

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1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

2 **NOTICE IS HEREBY GIVEN** that in accordance with Local Rule 79-5.1,
3 Defendant Rocket Lawyer Incorporated (“Rocket Lawyer”) will and hereby does
4 apply for an order permitting them to file under seal the following:

- 5 1) Unredacted Separate Statement of Undisputed Facts in Support of Rocket
6 Lawyer’s Motion for Summary Judgment (“SSUF”); and
7 2) Exhibit E to the Declaration of Hong-An Vu in Support of Rocket Lawyer
8 Incorporated’s Motion for Summary Judgment (“Exhibit”).

9 This application is made pursuant to Local Rule 79-5 et seq. and the
10 Stipulated Protective Order, entered on September 24, 2013 (ECF No. 39). Based
11 on the below reasons, the SSUF and Exhibit, the pleadings, papers and records on
12 file in this action, and any oral and documentary evidence and argument as
13 presented at the hearing.

14 **REASONS SUPPORTING RELIEF REQUESTED**

15 Good cause exists to seal the SSUF and the Exhibit. These documents are
16 subject to the Court’s protective order and the sealing of these documents is
17 necessary in order to protect information that Rocket Lawyer has designated as
18 “confidential” or “attorneys’ eyes only,” including without limitation, confidential
19 business information and other sensitive business data relating to Rocket Lawyer
20 Incorporated. *See* Protective Order, ECF No. 39, at 5-7.

21 **CONCLUSION**

22 For the foregoing reasons, Rocket Lawyer respectfully requests that the Court
23 order the SSUF and the Exhibit be filed under seal.

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Dated: August 4, 2014

GOODWIN PROCTER LLP

By: *Michael J. Jones* *(Pro)*
Forrest A. Hainline III (SBN 64166)
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

Attorneys for Defendant
ROCKET LAWYER INCORPORATED