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Attorneys for Plaintiff
LegalZoom.com, Inc.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

GlaserWeil

LEGALZOOM.COM, INC., a Delaware corporation

Plaintiff,

v.

ROCKET LAWYER INCORPORATED,
a Delaware corporation

Defendant.

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

**JOINT STIPULATION TO SEAL
LEGALZOOM.COM, INC.'S
MOTION FOR RULE 11
SANCTIONS (ECF NO. 121)**

Judge: Judge Gary A. Feess
Courtroom: 740
Place: 255 East Temple St.
Los Angeles, CA
90012

Action Filed: November 20, 2012

1 Defendant Rocket Lawyer Incorporated (“Rocket Lawyer”) and Plaintiff
2 LegalZoom, Inc. (“LegalZoom”), by and through their respective counsel of record,
3 hereby agree and stipulate as follows:

4 1. On September 26, 2014, LegalZoom filed its “LEGALZOOM.COM,
5 INC’S NOTICE OF MOTION AND MOTION FOR RULE 11 SANCTIONS;
6 MEMORANDUM OF POINTS AND AUTHORITIES” and supporting declarations
7 (ECF No. 121) (the “Motion”).

8 2. The Motion contains certain documents and information that was
9 designated as confidential under the terms of the Court’s Protective Order for this
10 case (the “Confidential Material”), and which Confidential Material should have been
11 filed under seal pursuant to that order.

12 3. LegalZoom maintains that the Motion was inadvertently filed by
13 LegalZoom without redaction, and without an application for filing under seal.

14 4. The parties now wish to take immediate steps to protect the Confidential
15 Material from disclosure pursuant to the Protective Order.

16 **BASED ON THE ABOVE**, Rocket Lawyer and LegalZoom hereby stipulate
17 and agree, subject to Court approval, to having the entire unredacted version of the
18 Motion, including the Declaration of Barak Vaughn and attached exhibits, removed
19 from the public court file, to having these documents filed under seal, and to allow
20 LegalZoom to file an appropriately redacted version of the Motion to be placed into
21 the public court file without seeking a new hearing date.

22 **IT IS SO STIPULATED:**

23 Dated: September 26, 2014

By: /s/Hong-An Vu (with permission)
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Attorneys for Defendant
ROCKET LAWYER INCORPORATED

Dated: September 26, 2014

By: /s/ Fred D. Heather
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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California; I am over the age of 18 and not a party to the within action; my business address is 10250 Constellation Boulevard, 19th Floor, Los Angeles, California 90067.

On September 26, 2014, I electronically filed the following document(s) using the CM/ECF system.

**JOINT STIPULATION TO SEAL LEGALZOOM.COM, INC.'S
MOTION FOR RULE 11 SANCTIONS (ECF NO. 121)**

Participants in the case are registered CM/ECF users and will be served by the CM/ECF system.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the above is true and correct.

Executed on September 26, 2014 at Los Angeles, California.

/s/ Fred Heather
Fred Heather