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7 Attorneys for Plaintiff
LegalZoom.com, Inc.

8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION

11 LEGALZOOM.COM, INC., a Delaware
corporation,

12 Plaintiff,

13 v.

14 ROCKET LAWYER INCORPORATED,
a Delaware corporation,

15 Defendants.
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CASE NO.: CV 12-9942-GAF (AGR_x)

**PLAINTIFF LEGALZOOM.COM,
INC.'S APPLICATION FOR AN
ORDER GRANTING LEAVE TO
FILE DOCUMENTS UNDER SEAL**

Date: TBD
Time: TBD
Judge: Hon. Gary A. Feess
Courtroom: 740
Action Filed: November 20, 2012

Glaser Weil Fink Jacobs
Howard Avchen & Shapiro LLP

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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORDS HEREIN:
2 NOTICE IS HEREBY GIVEN that in accordance with Local Rule 79-5.1, of
3 the Central District of California, Plaintiff LegalZoom.com, Inc. (“LegalZoom”)
4 hereby applies for an order permitting them to file under seal the following:

5 1) Unredacted Notice of Motion and Motion of LegalZoom.com, Inc. to
6 Supplement Factual Record in Opposition to Defendant Rocket Lawyer Incorporated’s
7 Motion for Summary Judgment.

8 2) Unredacted Declaration of Barak Vaughn Barak Vaughn in Support of the
9 Motion of LegalZoom.com, Inc. to Supplement Factual Record in Opposition to
10 Defendant Rocket Lawyer Incorporated’s Motion for Summary Judgment.

11 3) Exhibits to Declaration of Barak Vaughn.

12 This application is made pursuant to Local Rule 79-5 et seq. and the Stipulated
13 Protective Order, entered on September 24, 2013 (ECF No. 39).

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15 **REASONS SUPPORTING RELIEF REQUESTED**

16 Good cause exists to seal the Reply Memorandum of Points and Authorities
17 and Evidentiary Objections. These documents are subject to the Court’s protective
18 order and the sealing of these documents is necessary in order to protect information
19 that Rocket Lawyer has designated as “confidential” or “attorneys’ eyes only,”
20 including without limitation, confidential business information and other sensitive
21 business data relating to Rocket Lawyer Incorporated. See Protective Order, ECF No.
22 39, at 5-7.

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1 **CONCLUSION**

2 For the foregoing reasons, LegalZoom.com, Inc. respectfully requests that the
3 Court order its Notice of Motion and Motion of LegalZoom.com Inc. to Supplement
4 Factual Record in Opposition to Defendant Rocket Lawyer Incorporated's Motion for
5 Summary Judgment, the Declaration of Barak Vaughn filed under seal.

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7 DATED: September 29, 2014

Respectfully submitted,

8 GLASER WEIL FINK JACOBS
9 HOWARD AVCHEN & SHAPIRO LLP

10 By: _____ /s/ Fred Heather

11 PATRICIA L. GLASER
12 FRED D. HEATHER
13 PATRICIA J. WINOGRAD
14 Attorneys for Plaintiff
15 LegalZoom.com, Inc.

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