28

PATRICIA L. GLASER - State Bar No. 55668 pglaser@glaserweil.com FRED D. HEATHER - State Bar No. 110650 fheather@glaserweil.com 3 GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP 10250 Constellation Boulevard, 19th Floor 4 Los Angeles, California 90067 Telephone: (310) 553-3000 Facsimile: (310) 556-2920 6 Attorneys for Plaintiff 7 LegalZoom.com, Inc. 8 UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA 9 10 WESTERN DIVISION 11 CASE NO.: CV 12-9942-GAF (AGRx) LEGALZOOM.COM, INC., a Delaware corporation, 12 PLAINTIFF LEGALZOOM.COM, Plaintiff, INC.'S APPLICATION FOR AN 13 ORDER GRANTING LEAVE TO FILE DOCUMENTS UNDER SEAL 14 TBD ROCKET LAWYER INCORPORATED, Date: 15 Time: TBD a Delaware corporation, Hon. Gary A. Feess Judge: 16 Courtroom: Defendants. 740 Action Filed: November 20, 2012 17 18 19 20 21 22 23 24 25 26 27

TO ALL PARTIES AND THEIR ATTORENYS OF RECORDS HEREIN:

NOTICE IS HEREBY GIVEN that in accordance with Local Rule 79-5.1, of the Central District of California, Plaintiff LegalZoom.com, Inc. ("LegalZoom") hereby applies for an order permitting them to file under seal the following:

- 1) Unredacted Notice of Motion and Motion of LegalZoom.com, Inc. to Supplement Factual Record in Opposition to Defendant Rocket Lawyer Incoporated's Motion for Summary Judgment.
- 2) Unredacted Declaration of Barak Vaughn Barak Vaugh in Support of the Motion of LegalZoom.com, Inc. to Supplement Factual Record in Opposition to Defendant Rocket Lawyer Incoporated's Motion for Summary Judgment.
 - 3) Exhibits to Declaration of Barak Vaughn.

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

REASONS SUPPORTING RELIEF REQUESTED

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

Glaser Weil Fink Jacobs Howard Avchen & Shapiro LP

CONCLUSION

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

DATED: September 29, 2014

Respectfully submitted,

GLASER WEIL FINK JACOBS HOWARD AVCHEN & SHAPIRO LLP

By: /s/ Fred Heather

PATRICIA L. GLASER

FRED D. HEATHER

PATRICIA J. WINOGRAD

Attorneys for Plaintiff

LegalZoom.com, Inc.