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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**

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

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) Rocket Lawyer Incorporated’s Unredacted Opposition to Legalzoom.Com,
6 Inc.’s Motion for Rule 11 Sanctions; and
7 2) Exhibits 1 and 2 to the Declaration of Michael Jones in Support of Rocket
8 Lawyer’s Opposition to LegalZoom’s Motion for Rule 11 Sanctions.

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 Opposition and the Exhibits, the pleadings, papers and
12 records on file in this action, and any oral and documentary evidence and argument
13 as presented at the hearing.

14 **REASONS SUPPORTING RELIEF REQUESTED**

15 Good cause exists to seal the Opposition and the Exhibits. These documents
16 are 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” and “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. Specifically, Exhibit 1 is a
21 document produced by Rocket Lawyer that is designated “attorney’s eyes only,” and
22 Exhibit 2 and the Unredacted Opposition refer to confidential information from
23 within Exhibit 1.

24 **CONCLUSION**

25 For the foregoing reasons, Rocket Lawyer respectfully requests that the Court
26 order the Opposition and the Exhibits be filed under seal.
27
28

1 Dated: October 1, 2014

GOODWIN PROCTER LLP

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