1 PATRICIA L. GLASER - State Bar No. 55668 pglaser@glaserweil.com 2 FRED D. HEATHER - State Bar No. 110650 fheather@glaserweil.com 3 GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP 10250 Constellation Boulevard, 19th Floor 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 9 CENTRAL DISTRICT OF CALIFORNIA 10 WESTERN DIVISION 11 LEGALZOOM.COM, INC., a Delaware CASE NO.: CV 12-9942-GAF (AGRx) corporation, 12 PLAINTIFF LEGALZOOM.COM. Plaintiff, **INC.'S APPLICATION FOR AN** 13 ORDER GRANTING LEAVE TO FILE DOCUMENTS UNDER SEAL 14 ROCKET LAWYER INCORPORATED. Judge: Hon. Gary A. Feess 15 a Delaware corporation, Courtroom: 740 Action Filed: November 20, 2012 . 16 Defendants. 17 18 19 20 21 22 23 24 25 26 27 28

## 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) Reply Memorandum of Points and Authorities (Unredacted) in Support of LegalZoom.com, Inc.'s Motion for Rule 11 Sanctions;
- 2) Reply Memorandum of Points and Authorities (Unredacted) in Support of LegalZoom.com, Inc.'s Motion to Supplement Factual Record; and
  - 3) Exhibits A-C and E to Fred Heather's Declaration.

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 (Unredacted) in Support of LegalZoom.com, Inc.'s Motion for Rule 11 Sanctions, Reply Memorandum of Points and Authorities (Unredacted) in Support of LegalZoom.com, Inc.'s Motion to Supplement Factual Record and Exhibits A-E to Fred Heather's Declaration. 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 LLP

28

## For the foregoing reasons, LegalZoom.com, Inc. respectfully requests that the 2 Court order its Reply Memorandum of Points and Authorities (Unredacted) in 3 Support of LegalZoom.com, Inc.'s Motion for Rule 11 Sanctions, Reply Memorandum of Points and Authorities (Unredacted) in Support of LegalZoom.com, Inc.'s Motion to Supplement Factual Record and Exhibits A-C and E to Fred Heather's Declaration be filed under seal. DATED: October 13, 2014 Respectfully submitted, 10 GLASER WEIL FINK JACOBS HOWARD AVCHEN & SHAPIRO LLP 11 12 /s/ Fred Heather By: \_ 13 PATRICIA L. GLASER FRED D. HEATHER 14 PATRICIA J. WINOGRAD 15 Attorneys for Plaintiff LegalZoom.com, Inc. 16 17 18 19 20 21 22 23 24 25 26 27

**CONCLUSION**