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14 *Attorneys for Defendant*  
**ROCKET LAWYER INCORPORATED**

15  
16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

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

20 Plaintiff,

21 v.

22 ROCKET LAWYER  
23 INCORPORATED, a Delaware  
corporation,

24 Defendant.

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

**DECLARATION OF HONGAN VU  
IN SUPPORT OF ROCKET  
LAWYER INCORPORATED'S *EX  
PARTE* APPLICATION TO FILE  
MOTION TO SUPPLEMENT  
FACTUAL RECORD AND TO  
ESTABLISH BRIEFING  
SCHEDULE**

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



1 I declare under penalty of perjury under the laws of the State of California  
2 that the foregoing is true and correct. Executed on this 21st day of October, 2014.

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/s/ Hong-An Vu  
HONG-AN VU

***EXHIBIT A***

***EXHIBIT A***

## Vu, Hong-An

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**From:** Aaron Allan <aallan@glaserweil.com>  
**Sent:** Monday, October 20, 2014 5:11 PM  
**To:** Vu, Hong-An  
**Cc:** Hainline, Forrest A; Jones, Michael T; Cook, Brian W; Barak Vaughn; Fred Heather  
**Subject:** RE: Rocket Lawyer Ex Parte to Supplement the Record

Thank you for the clarification. But our position remains the same, and we intend to oppose.

**Aaron P. Allan** | Partner  
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10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067  
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**From:** Vu, Hong-An [<mailto:HVu@goodwinprocter.com>]  
**Sent:** Monday, October 20, 2014 5:04 PM  
**To:** Aaron Allan  
**Cc:** Hainline, Forrest A; Jones, Michael T; Cook, Brian W; Barak Vaughn; Fred Heather  
**Subject:** RE: Rocket Lawyer Ex Parte to Supplement the Record

Aaron,

We have taken what you said into consideration. We will file tomorrow an ex parte application seeking leave to file the accompanying motion to supplement the record and to set a briefing schedule such that the motion may be heard on November 10. Please let us know if this changes your position.

Thanks,  
Hong-An

Hong-An Vu  
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**From:** Aaron Allan [<mailto:aallan@glaserweil.com>]  
**Sent:** Monday, October 20, 2014 3:41 PM  
**To:** Vu, Hong-An  
**Cc:** Hainline, Forrest A; Jones, Michael T; Cook, Brian W; Barak Vaughn; Fred Heather  
**Subject:** RE: Rocket Lawyer Ex Parte to Supplement the Record

Dear Hong-An,

Thank you for your email. Based on your description of the application and the relief being sought, it appears that your application is neither procedurally proper nor supported by the record, and we intend to oppose it. We strongly suggest that you reconsider before pursuing such an application.

Aaron

**Aaron P. Allan** | Partner

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**From:** Vu, Hong-An [<mailto:HVu@goodwinprocter.com>]  
**Sent:** Monday, October 20, 2014 3:08 PM  
**To:** Fred Heather; Aaron Allan  
**Cc:** Hainline, Forrest A; Jones, Michael T; Cook, Brian W; Barak Vaughn  
**Subject:** Rocket Lawyer Ex Parte to Supplement the Record

Fred and Aaron,

As discussed on the call at 2:44 p.m., here is a short description of our ex parte application.

We are seeking to supplement the summary judgment record with very recently acquired evidence. Specifically, we would like the court to consider that you have not provided a 30(b)(6) witness to testify about damages and that your damages expert has only provided an opinion about business formation ads and ads that were placed on LegalZoom’s brand terms. You have not provided any evidence relating to damages from ads that appear on Rocket Lawyer’s website, in particular, your allegations relating to free trial, free legal review, and free help from local attorneys ads. Rocket Lawyer intends to move ex parte because there is not sufficient time between now and the November 10 hearing to file and brief the motion pursuant to 35 day minimum meet and confer and briefing schedule established by the local rules.

You stated on the call that you would respond to us by midnight tonight about whether you will oppose this application or not. We look forward to your response.

Thanks,  
Hong-An

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