

1 Forrest A. Hainline III (SBN 64166)
 fhainline@goodwinprocter.com
 2 Hong-An Vu (SBN 266268)
 hvu@goodwinprocter.com
 3 **GOODWIN PROCTER LLP**
 Three Embarcadero Center
 4 24th Floor
 San Francisco, California 94111
 5 Tel.: 415.733.6000
 Fax.: 415.677.9041

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6 Michael T. Jones (SBN 290660)
 mjones@goodwinprocter.com
 7 **GOODWIN PROCTER LLP**
 135 Commonwealth Drive
 8 Menlo Park, California 94025-1105
 9 Tel.: 650.752.3100
 Fax.: 650.853.1038

10 Brian W. Cook (*Pro Hac Vice*)
 bcook@goodwinprocter.com
 11 **GOODWIN PROCTER LLP**
 53 State Street
 12 Boston, MA 02109-2802
 13 Tel.: 617.570.1000
 Fax.: 617.523.1231

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
 DOCUMENT 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) Exhibit 1 to the Declaration of Michael Jones in Support of Rocket
6 Lawyer Incorporated’s Motion to Supplement Factual Record in Support
7 of its Motion for Summary Judgment (the “Exhibit”)

8 This application is made pursuant to Local Rule 79-5 et seq. and the
9 Stipulated Protective Order, entered on September 24, 2013 (ECF No. 39). Based
10 on the below reasons, the Exhibit, the pleadings, papers and records on file in this
11 action, and any oral and documentary evidence and argument as presented at the
12 hearing.

13 **REASONS SUPPORTING RELIEF REQUESTED**

14 Good cause exists to seal the Exhibit. This document is subject to the Court’s
15 protective order and the sealing of this document is necessary in order to protect
16 information that Rocket Lawyer has designated as “confidential” and “attorneys’
17 eyes only,” including without limitation, confidential business information and other
18 sensitive business data relating to Rocket Lawyer Incorporated. *See* Protective
19 Order, ECF No. 39, at 5-7. Specifically, Exhibit 1, an expert report produced by
20 LegalZoom that is marked Attorneys’ Eyes Only and extensively references
21 confidential financial information.

22 **CONCLUSION**

23 For the foregoing reasons, Rocket Lawyer respectfully requests that the Court
24 order the Exhibit be filed under seal.
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1 Dated: October 21, 2014

GOODWIN PROCTER LLP

2 By: *Michael Jones/Jace*
3 Forrest A. Hainline III (SBN 64166)
4 *fhainline@goodwinprocter.com*
5 Hong-An Vu (SBN 266268)
6 *hvu@goodwinprocter.com*
7 Michael T. Jones (SBN 290660)
8 *mjones@goodwinprocter.com*
9 Brian W. Cook (*Pro Hac Vice*)
10 *bcook@goodwinprocter.com*
11 **GOODWIN PROCTER LLP**

Attorneys for Defendant
ROCKET LAWYER INCORPORATED

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