

1 Forrest A. Hainline III (SBN 64166)
 2 *fhainline@goodwinprocter.com*
 3 Hong-An Vu (SBN 266268)
 4 *hvu@goodwinprocter.com*
 5 **GOODWIN PROCTER LLP**
 6 Three Embarcadero Center
 7 24th Floor
 8 San Francisco, California 94111
 9 Tel.: 415.733.6000
 10 Fax.: 415.677.9041

11 Michael T. Jones (SBN 290660)
 12 *mjones@goodwinprocter.com*
 13 **GOODWIN PROCTER LLP**
 14 135 Commonwealth Drive
 15 Menlo Park, California 94025-1105
 16 Tel.: 650.752.3100
 17 Fax.: 650.853.1038

18 Brian W. Cook (*Pro Hac Vice*)
 19 *bcook@goodwinprocter.com*
 20 **GOODWIN PROCTER LLP**
 21 53 State Street
 22 Boston, MA 02109-2802
 23 Tel.: 617.570.1000
 24 Fax.: 617.523.1231

25 *Attorneys for Defendant*
 26 **ROCKET LAWYER INCORPORATED**

27 **UNITED STATES DISTRICT COURT**
 28 **CENTRAL DISTRICT OF CALIFORNIA**
WESTERN DIVISION

19 LEGALZOOM.COM, INC., a Delaware
 20 corporation,
 21 Plaintiff,
 22 v.
 23 ROCKET LAWYER
 24 INCORPORATED, a Delaware
 25 corporation,
 26 Defendant.

Case No. 2:12-cv-09942-GAF-AGR
**JOINT STIPULATION FOR ORDER
 RE SCHEDULING AND LIMITED
 ADDITIONAL DISCOVERY**
 Judge: Judge Gary A. Feess
 Courtroom: 740
 255 East Temple Street
 Los Angeles, CA 90012
 Action Filed: November 20, 2012

1 Plaintiff and counterclaim defendant LegalZoom.com, Inc. and defendant and
2 counterclaimant Rocket Lawyer Incorporated hereby stipulate as follows:

3 1. On October 31, 2014, the parties appeared for a status conference in the
4 above-captioned matter.

5 2. At the October 31 status conference, the Court vacated all pending
6 motion, pretrial, and trial dates, and ordered that the parties submit a trial plan with
7 dates for submission of supplemental materials relating to the cross-motions for
8 summary judgment, and a scope for limited additional discovery.

9 3. After meeting and conferring, the parties agreed on a case schedule and
10 topics for discovery.

11 Therefore, the parties agree that, subject to the Court's approval, the case
12 shall proceed on the following schedule:

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Matter	Weeks before trial (at least)	Proposed Deadline
Trial Estimated length: 6 trial days		April 21, 2015 –April 28, 2015
Hearing on Motions in Limine; Hearing on Disputed Jury Instructions	-1	April 14, 2015
Pretrial Conference; Motions in Limine to be filed; Proposed Voir Dire Qs Lodged and Agreed-to Statement of Case	-4	March 16, 2015
Deadline to amend pretrial filings	-6	March 10, 2015
Last date to conduct Settlement Conference (with Magistrate Gandhi as originally proposed in Rule 26(f) Report)	-8	February 24, 2015
Hearing on Cross-Motions for Summary Judgment	N/A	February 16, 2015
Deadline to supplement summary judgment record	N/A	February 2, 2015 (only one brief per side per motion)

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Matter	Weeks before trial (at least)	Proposed Deadline
Close of Limited Renewed Discovery (start date – November 14, 2014 or as soon as the court enters an order re scheduling and renewed discovery)	N/A	January 16, 2015

During the approximately 60-day renewed discovery period, the parties agree that:

1. LegalZoom may pursue the following discovery:
 - a. Depositions of third-parties:
 - i. Dr. Elizabeth Ferguson;
 - ii. Jenn Mazzon;
 - iii. Michael Margolis;
 - iv. Katherine K (Google);
 - v. Google relating to Google’s inquiry into Rocket Lawyer’s free advertisements
 - b. Deposition of Alan Hungate regarding the reports served on November 5, 2014;
 - c. Document Subpoenas:
 - i. Dr. Elizabeth Ferguson;
 - ii. Google Ventures relating to any and all Topline studies and/or any studies done by Google Ventures concerning Rocket Lawyer to the extent these studies relate to the advertisements at issue in this litigation or other similar free advertisements and have not been produced; and
 - iii. Google relating to Google’s inquiry into Rocket Lawyer’s free advertisements; and
 - d. Documents from Rocket Lawyer:

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- i. The other usability studies, including all videotapes and notes taken in conjunction with each of these studies referenced in RLI0040690 to the extent these studies relate to the advertisements at issue in this litigation and have not been produced.
- ii. Any and all Topline studies and/or any studies done by Google Ventures concerning Rocket Lawyer, including any videotapes and/or notes taken in conjunction thereto to the extent these studies relate to the advertisements at issue in this litigation or other similar free advertisements and have not been produced.
- iii. The identity of Katherine K of Google as referenced in RLI0042339.

2. Rocket Lawyer may pursue the following discovery:

- a. Deposition of Dr. Goedde concerning his Second Supplemental Report served on October 6, 2014;
- b. Deposition of Dr. Isaacson's concerning his Second Supplement Report served on October 27, 2014;
- c. Document and deposition subpoenas for Google relating to any inquiry made to LegalZoom concerning double serving/bidding;
- d. Deposition of Matt Scanlan (Google); and
- e. Documents and Information from LegalZoom:
 - i. WTR/NPS reports from January 2009 to September 2013 that include (i) complaints relating to LegalZoom's business formation services; (ii) complaints relating to LegalZoom's free trial; (iii) complaints relating to ads both in search engine marketing and on your website for free products or services.
 - ii. Permissions from consumers to use their WTR/NPS responses in marketing.

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IT IS SO STIPULATED.

Dated: November 7, 2014

Respectfully submitted,

By: /s/ Hong-An Vu
Forrest A. Hainline III
fhainline@goodwinprocter.com
Hong-An Vu (SBN 266268)
hvu@goodwinprocter.com
Michael T. Jones (SBN 290660)
mjones@goodwinprocter.com
Brian W. Cook (*Pro Hac Vice*)
bcook@goodwinprocter.com
GOODWIN PROCTER LLP
Three Embarcadero Center
24th Floor
San Francisco, California 94111
Tel.: 415.733.6000
Fax.: 415.677.9041

Attorneys for Defendant
ROCKET LAWYER INCORPORATED

Dated: November 7, 2014

By: /s/ Aaron Allan (with permission)
Patricia L. Glaser
pglaser@glaserweil.com
Fred D. Heather
fheather@glaserweil.com
Aaron Allan
aallan@glaserweil.com
**GLASER WEIL FINK JACOBS
HOWARD AVCHEN & SHAPIRO
LLP**
10250 Constellation Boulevard,
19th Floor
Los Angeles, California 90067
Tel.: (310) 553-3000
Fax.: (310) 556-2920

Attorneys for Plaintiff
LEGALZOOM.COM, INC.