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 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  
**[PROPOSED] ORDER GRANTING  
 STIPULATION RE SCHEDULING  
 AND ADDITIONAL DISCOVERY**  
 Judge: Judge Gary A. Feess  
 Courtroom: 740  
 255 East Temple Street  
 Los Angeles, CA 90012  
 Action Filed: November 20, 2012

1           Upon consideration of the *Joint Stipulation for Order re Scheduling and*  
 2 *Limited Additional Discovery* and good cause appearing, the Court hereby  
 3 **ORDERS** the following:

4           The above-captioned action shall proceed on the following schedule:

<b>Matter</b>	<b>Weeks before trial (at least)</b>	<b>Proposed Deadline</b>
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)
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

25           During the approximately 60-day renewed discovery period:

- 26           1. LegalZoom may pursue the following discovery:
- 27                 a. Depositions of third-parties:
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- 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:
- 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.

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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.
  - iii. Studies and surveys (including usability studies, focus group studies, and awareness studies) conducted or commissioned by LegalZoom concerning: (i) Rocket Lawyer; (ii) freemium offerings/microsites (e.g., Legalcenterpro, lightwavelaw, creating will); (iii) LegalZoom's Free Trial offerings; and/or (iv) fee disclosures for LegalZoom's business formation offerings.
  - iv. Payments to LegalSpring.com, Own Vision, and/or Mr. Giggy relating to LegalSpring's affiliate relationship with LegalZoom, including data and reports from Cake, Direct track, and LegalZoom's payment tracking system.

1           A party who receives documents or information in response to a third party  
2 subpoena shall produce to the other party a copy of all such documents and  
3 information within three business days.

4           A non-subpoenaing party may ask questions at deposition in case the witness  
5 become unavailable for trial and to avoid having such witnesses appear for more  
6 than one deposition.

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**IT IS SO ORDERED.**

DATED:

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Honorable Gary A. Feess  
United States District Court Judge  
Central District of California