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15 **ROCKET LAWYER INCORPORATED**

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

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

21 Plaintiff,

22 v.

23 **ROCKET LAWYER**
INCORPORATED, a Delaware
24 corporation,

25 Defendant.

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

**JOINT STIPULATION VACATING
TRIAL DATE AND REVISING
SCHEDULE FOR COMPLETING
DISCOVERY AND FILING
SUMMARY JUDGMENT MOTIONS**

Judge: Judge John E. McDermott
Courtroom: 312 N. Spring Street,
Courtroom C, 8th Floor
Los Angeles, CA 90012
Action Filed: November 20, 2012

1 WHEREAS an order entered in this case on November 10, 2014 (the “Prior
2 Order”), granted a stipulation of the parties to take additional limited discovery from
3 each other and from third parties, including Google, Inc., as a means to supplement
4 the record for purposes of briefing cross-motions for summary judgment;

5 WHEREAS the Prior Order required the close of additional limited discovery
6 by January 16, 2015, a deadline to supplement the record of February 2, 2015, a
7 hearing date on cross motions for summary judgment of February 23, 2015, and a
8 trial date of April 21, 2015;

9 WHEREAS LegalZoom.com, Inc., represents that it (a) has been unable to
10 complete all of the contemplated third party discovery necessary to supplement the
11 record, (b) has on January 5, 2015, filed in the Northern District of California a
12 motion to compel a document production by Google, Inc., and (c) contemplates at
13 least one additional motion to compel deposition testimony by an employee of
14 Google Ventures, named Michael Margolis, to be filed in the Western District of
15 Washington;

16 WHEREAS the parties appeared at a case status conference on January 7,
17 2015, to discuss the case schedule and the anticipated completion date for discovery
18 from Google, Inc. and others;

19 WHEREAS the Court suggested, and the parties agreed, that a new schedule
20 for supplementing the record and hearing summary judgment motions be agreed to
21 by the parties and submitted to the Court for approval.

22 THEREFORE, Plaintiff and counterclaim defendant LegalZoom.com, Inc.
23 and defendant and counterclaimant Rocket Lawyer Incorporated hereby stipulate as
24 follows:

25 1. The parties shall appear before Magistrate Judge Segal for a Settlement
26 Conference on March 17, 2015.

1 2. The new deadline for completing additional discovery from third
2 parties, which remains subject to the category and witness limits of the Prior Order,
3 is May 19, 2015.

4 3. Upon learning that the completion of third party discovery is either not
5 possible or very unlikely by the May 19, 2015, deadline, counsel shall notify the
6 opposing party and the Court, and may, no later than April 24, 2015, file a request
7 seeking an additional extension of the deadlines provided by this stipulation and
8 order.

9 4. Upon completing all third party discovery, the parties may submit new
10 cross-motions for summary judgment (which will supersede prior summary
11 judgment filings) on or before June 12, 2015.

12 5. Summary judgment opposition briefs shall be due on or before July 3,
13 2015.

14 6. Summary judgment reply briefs shall be due on or before July 17,
15 2015.

16 7. A hearing to decide the summary judgment motions shall be held on
17 August 10, 2015, or as soon thereafter as the Court's calendar permits. At that
18 hearing, the Court shall also hear argument concerning the Rule 11 motion
19 previously brought by LegalZoom and briefed by the parties.

20 8. One week after the hearing on summary judgment motions, the Court
21 shall conduct a status conference at which a new trial date and new dates for all
22 pretrial filings shall be set.

23 **IT IS SO STIPULATED.**

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Dated: January 13, 2015

Respectfully submitted,

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Dated: January 13, 2015

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