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9 **UNITED STATES DISTRICT COURT**
 10 **CENTRAL DISTRICT OF CALIFORNIA**

GlaserWeil

11 LEGALZOOM.COM, INC., a Delaware
 12 corporation
 13 Plaintiff,
 14 v.
 15 ROCKET LAWYER INCORPORATED,
 16 a Delaware corporation
 17 Defendant.
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USDC Case No: CV 12-9942 JEM
 Hon. John E. McDermott

**STATUS REPORT CONCERNING
 THIRD PARTY DISCOVERY AND
 REQUEST FOR ADDITIONAL
 EXTENSION OF COURT
 DEADLINES**

1 **TO THE HONORABLE JOHN E. MCDERMOTT AND ALL COUNSEL**
2 **OF RECORD:**

3 WHEREAS, pursuant to a stipulation and order entered on January 20, 2015,
4 this Court permitted LegalZoom additional time to pursue discovery from third
5 parties, including Google and Google Ventures, and set a deadline of May 19, 2015,
6 for the completion of that discovery;

7 WHEREAS, the Court recognized the possibility that discovery from third
8 parties might take longer than anticipated to complete, based on Google’s resistance
9 to that discovery; and

10 WHEREAS, the Court set a deadline of April 24, 2015, for LegalZoom to
11 notify the Court and Rocket Lawyer if the completion of discovery was unlikely by
12 May 19, 2015, and to file a request seeking the extension of that deadline.

13 NOW, based on the above, PLEASE TAKE NOTICE:

14 1. LegalZoom has been diligently pursuing the following third party
15 discovery: LegalZoom has taken the depositions of Elizabeth Ferguson, Jennifer
16 Mazzon, and Alan Hungate. LegalZoom also issued two deposition subpoenas for
17 records and/or testimony to Google and Michael Margolis, a principal at Google
18 Ventures, pursuant to the parties stipulation and order signed on November 10, 2014,
19 by Judge Feess. LegalZoom has diligently sought the whereabouts of Katherine K
20 (Kramer), a former employee of Google. LegalZoom has found that she is currently a
21 graduate student at Stanford University, and is working to serve her with a deposition
22 subpoena.

23 2. LegalZoom filed two motions to compel compliance with a subpoena
24 against Google, in the Northern District of California, and against Michael Margolis,
25 in the Western District of Washington.

26 3. The motion to compel against Google was denied on March 23, 2015,
27 which required LegalZoom to pursue an appeal from that denial. That appeal is still
28 pending. In addition, the Western District of Washington issued a stay of its

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proceedings until the appeal in the Northern District of California is heard, and an Order is issued.

4. Based on the status of LegalZoom’s discovery efforts against Google, it is not possible that discovery will be completed by the May 19, 2015 Court deadline.

THEREFORE,

LegalZoom respectfully requests that the Court move the deadline to complete third party discovery by an additional 120 days (to September 16, 2015), subject to any further request for extension based on how that discovery progresses over the next few months.

DATED: April 15, 2015

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BY: /s/ Fred D. Heather
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