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7 *Attorneys for Defendant*  
**ROCKET LAWYER INCORPORATED**

9 **UNITED STATES DISTRICT COURT**  
 10 **CENTRAL DISTRICT OF CALIFORNIA**  
 11 **WESTERN DIVISION**

13 LEGALZOOM.COM, INC., a Delaware  
 corporation,  
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 Plaintiff,  
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 v.  
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 ROCKET LAWYER  
 17 INCORPORATED, a Delaware  
 corporation,  
 18  
 Defendant.

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

**STIPULATION REGARDING  
 MEDIATION AND STAY OF  
 DISCOVERY**

Judge: Judge Gary A. Feess  
 Courtroom: 740  
 255 East Temple Street  
 Los Angeles, CA 90012  
 Action Filed: November 20, 2012

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1           **IT IS HEREBY STIPULATED AND AGREED**, by and between on the  
2 one hand, LegalZoom.com, Inc. (“LegalZoom”), and on the other hand, Rocket  
3 Lawyer Incorporated (“Rocket Lawyer”) (collectively, the “Parties”) through their  
4 attorneys, as follows:

5           1.     The Parties will mediate all claims and counterclaims before Magistrate  
6           Judge Jay C. Gandhi.

7           2.     Discovery will be stayed pending mediation.

8           3.     The Parties will exchange the following information on or before April  
9           30, 2013:

10          a.     Rocket Lawyer shall provide LegalZoom with:

11           i.     The number of customers converted from advertisements  
12           using the term “free” but not stating “plus state filing fees”  
13           or the equivalent, and triggered by LegalZoom brand  
14           terms versus not triggered by LegalZoom brand terms on  
15           Google, Bing and Yahoo for the period beginning October  
16           12, 2011, to March 25, 2013; and

17           ii.    Estimated revenue from customers converted from  
18           advertisements using the term “free” but not stating “plus  
19           state filing fees” or the equivalent, and triggered by  
20           LegalZoom brand terms.

21          b.     LegalZoom shall provide Rocket Lawyer with:

22           i.     The number of customers converted from advertisements  
23           including the term “free” (including, “Don’t Trust Free”)  
24           but not stating or referencing state filing fees or the  
25           equivalent, and triggered by Rocket Lawyer brand terms  
26           on Google, Bing, and Yahoo for the period beginning  
27           October 12, 2011 to March 25, 2013;

28           ii.    The number of users directed to LegalZoom’s website

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from [www.legalspring.com](http://www.legalspring.com) via its unique URL from October 12, 2011 to the present;

- iii. The net revenue generated from [www.legalspring.com](http://www.legalspring.com) customers from October 12, 2011 to the present; and
- iv. The commissions paid to [www.legalspring.com](http://www.legalspring.com) from October 12, 2011 to the present.

- 4. Mediation will occur no less than ten (10) days and no more than thirty (30) days after the exchange of information. If, despite their good faith efforts, the Parties are unable to schedule mediation within thirty days of the exchange of information, they may extend this schedule by mutual agreement.
- 5. Should the case proceed beyond mediation, discovery shall resume. Responses to previously-served discovery shall be served within thirty (30) days after the conclusion of mediation.
- 6. The Parties agree that the settlement privilege shall apply to the mediation, and the Parties will otherwise maintain confidentiality of the mediation.

1 Dated: April 8, 2013

Respectfully submitted,

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By: /s/ Forrest A. Hainline III  
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*Attorneys for Defendant*  
**ROCKET LAWYER INCORPORATED**

Dated: April 8, 2013

Respectfully submitted,

By: /s/ Fred D. Heather  
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Fax. 310.556.2920

*Attorneys for Defendant*  
**LEGALZOOM.COM, INC.**

1 **PROOF OF SERVICE**

2 I, the undersigned, certify and declare that I am over the age of 18 years,  
3 employed in Suffolk County Commonwealth of Massachusetts, and not a party to  
4 the above-entitled cause. On April 8, 2013, I electronically filed the following  
5 document(s) using the CM/ECF system.

6 **STIPULATION REGARDING MEDIATION AND STAY OF**  
7 **DISCOVERY; and**

8 **[PROPOSED] ORDER REGARDING MEDIATION AND STAY OF**  
9 **DISCOVERY.**

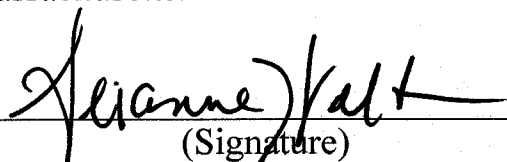
10 Participants in the case who are registered CM/ECF users will be served by  
11 the CM/ECF system. I further certify that some of the participants in the case are not  
12 registered CM/ECF users. I have mailed the foregoing document by First Class  
13 Mail, Federal Express, postage prepaid, or have dispatched it to a third party  
14 commercial carrier for delivery within 3 calendar days, to the following non-  
15 CM/ECF participants:

16 <b>Mary Ann Thi Nguyen</b> 17 Glaser Weil Fink Jacobs Howard Avchen 18 and Shapiro LLP 19 10250 Constellation Boulevard 20 19th Floor 21 Los Angeles, CA 90067	
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22 I declare under penalty of perjury that I am employed in the office of a  
23 member of the bar of this Court at whose direction this service was made and that  
24 the foregoing is true and correct.

25 Executed on April 8, 2013, at Boston, Massachusetts.

26 Arianne M. Waldron  
27 \_\_\_\_\_  
28 (Type or print name)

  
(Signature)