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7 *Attorneys for Defendant*
ROCKET LAWYER INCORPORATED

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 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
**ROCKET LAWYER, INC.'S
 INITIAL DISCLOSURES
 PURSUANT TO FED. R. CIV. PROC.
 26(A)(1)**
 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 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant
2 Rocket Lawyer, Inc. (“Rocket Lawyer”), by and through its attorneys, hereby
3 submits the following initial disclosures. These disclosures are based on
4 information reasonably available at the time. Rocket Lawyer reserves the right to
5 supplement or amend these disclosures as additional information becomes available
6 during the discovery process. These initial disclosures do not waive Rocket
7 Lawyer’s right to object to the disclosure of any information or documents on any
8 grounds including, but not limited to, privilege, relevance, or prejudice, provided by
9 the Federal Rules of Civil Procedure or the Local Civil Rules of the United States
10 District Court for the Central District of California.

11 **I. Rule 26(a)(1)(A)(i) – Individuals**

12 Pursuant to Rule 26(a)(1)(A), Rocket Lawyer presently believes that the
13 following individuals are likely to have discoverable information that Rocket
14 Lawyer may use to support its claims or defenses, excluding persons to be used
15 solely for impeachment. The subjects of discoverable information for which these
16 individuals are identified are also provided. Rocket Lawyer reserves the right to
17 identify additional individuals with relevant information at a later date. Rocket
18 Lawyer also reserves the right to rely upon information derived from additional
19 persons as such individuals come to its attention through further discovery and
20 investigation, to rely upon evidence obtained from any persons identified by any
21 party to this litigation and to rely upon evidence obtained from the foregoing
22 individuals with respect to any subject.

- 23
24 1. Charles Moore
25 Founder and Executive Chairman of Rocket Lawyer
26 c/o Forrest A. Hainline III
27 *fhainline@goodwinprocter.com*
28 GOODWIN PROCTER LLP
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1 2. Alisa Weiner
2 Vice President of Marketing for Rocket Lawyer
3 c/o Forrest A. Hainline III
4 *fhainline@goodwinprocter.com*
5 Goodwin Procter LLP
6 Three Embarcadero Center, 24th Floor
7 San Francisco, California 94111

8 The aforementioned individuals have knowledge of and are expected to
9 provide information regarding Rocket Lawyer’s marketing, advertising, promotions,
10 and business operations, policies, and conduct.

11 **II. Rule 26(a)(1)(A)(ii) – Documents**

12 Based upon investigation and currently available information, Rocket Lawyer
13 identifies the following categories of documents, data compilations, and tangible
14 things currently within Rocket Lawyer’s possession, custody, or control, which it
15 may use to support its claims or defenses, excluding those which are to be used
16 solely for impeachment. Rocket Lawyer reserves the right to rely upon any
17 additional documents, data compilations, and tangible things obtained through
18 further discovery and investigation, and any documents, data compilations, and
19 tangible things identified by any party to this litigation.

- 20 1. Advertising by Plaintiff in various formats and locations;
- 21 2. Screenshots of advertising by Rocket Lawyer in various formats and
22 locations;
- 23 3. Screenshots of LegalSpring.com;
- 24 4. Documents and communications establishing the relationship between
25 Plaintiff and LegalSpring.com, as well as its creator, Travis Giggy;
- 26 5. Documents showing the volume of business driven to Plaintiff through
27 its affiliation with and/or direction of LegalSpring.com;
- 28 6. Documents showing Plaintiff’s history of duplicating Rocket Lawyer’s
 products, services, and web layouts;
7. Documents and communications related to LegalZoom’s advertising

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use of the word “free”;

- 8. News articles, analyst reports, and other public media; and
- 9. Documents produced by any party to this litigation.

III. Rule 26(a)(1)(A)(iii) - Damages

Rocket Lawyer has no knowledge of the total amount of damages as no discovery has not yet occurred. Rocket Lawyer seeks damages resulting from LegalZoom’s improper conduct, including statutory damages, restitution for LegalZoom’s violation of Cal. Bus. & Prof. Code § 17200, punitive and exemplary damages, and its reasonable attorneys’ fees and costs. Rocket Lawyer expects that the total amount of damages will be determined in part by the nature of LegalZoom’s relationship with LegalSpring, the volume of customers channeled to LegalZoom by LegalSpring, the revenue received as a result and any payments made by LegalZoom to LegalSpring in exchange.

IV. Rule 26(a)(1)(A)(iv) - Insurance

Rocket Lawyer has no knowledge of any indemnity or insurance coverage applicable to any claim or defense in this action.

Dated: April 8, 2013

Respectfully submitted,

By: /s/ Forrest A. Hainline III
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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 **ROCKET LAWYER, INC.'S INITIAL DISCLOSURES PURSUANT TO**
7 **FED. R. CIV. PROC. 26(A)(1)**

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

<p>14 Mary Ann Thi Nguyen 15 Glaser Weil Fink Jacobs Howard Avchen 16 and Shapiro LLP 17 10250 Constellation Boulevard 18 19th Floor Los Angeles, CA 90067</p>	
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19 I declare under penalty of perjury that I am employed in the office of a
20 member of the bar of this Court at whose direction this service was made and that
21 the foregoing is true and correct.

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

23
24
25 Arianne M . Waldron
26 (Type or print name)

Arianne M. Waldron
(Signature)