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

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

20 Plaintiff,

21 v.

22 ROCKET LAWYER  
 23 INCORPORATED, a Delaware  
 24 corporation,

25 Defendant.

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

**LEGALZOOM.COM, INC.'S  
 AMENDED RULE 26(A)(1)  
 DISCLOSURES**

Judge: Judge Gary A. Feess  
 Courtroom: 740  
 255 East Temple Street  
 Los Angeles, CA 90012

Action Filed: November 20, 2012

26 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Plaintiff  
 27 LegalZoom.com, Inc. (“LegalZoom” or “Plaintiff”), by and through its undersigned  
 28 counsel, hereby submits the following amended disclosures (“Amended  
 Disclosures”).

**I. INTRODUCTORY STATEMENT**

These Amended Disclosures represent the product of LegalZoom’s  
 investigation to date. Further investigation and discovery may bring light to

1 additional information that may have a bearing on LegalZoom's claims and defenses  
2 in this matter. LegalZoom reserves the right to supplement or amend its Initial  
3 Disclosures and these Amended Disclosures as additional information becomes  
4 available to LegalZoom upon further investigation and discovery. LegalZoom's  
5 disclosures are made without waiving, in any respect, the right to object the use of  
6 any such information, for any purpose, in whole or in part, in any subsequent state  
7 or proceeding in this action or any other action, or any other discovery proceeding  
8 involving or relating to the subject matter of these disclosures, on the grounds of  
9 competency, privilege, relevance, materiality, hearsay, or any other proper ground  
10 provided by the Federal Rules of Civil Procedure or the Local Civil Rules of the  
11 United States District Court for the Central District of California.

12 The following Amended Disclosures are made based on the information  
13 reasonably available to LegalZoom as of the date of these disclosures and represent  
14 LegalZoom's good faith effort to identify information pertaining to the allegations  
15 in this litigation. LegalZoom anticipates that further investigation, research and  
16 analysis will supply additional facts and documents and add meaning to known  
17 facts, all of which may in turn lead to substantial additions or changes to these  
18 disclosures.

19 All of the disclosures set forth below are made subject to the above comments  
20 and qualifications.

21 **II. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE**  
22 **INFORMATION (RULE 26(a)(1)(A)(i))**

23 LegalZoom amends its Initial Disclosures pursuant to Rule 26(a)(1)(A) as  
24 follows:

25 Based upon information reasonably available to LegalZoom at this time,  
26 LegalZoom hereby identifies the following individuals who are likely to have  
27 discoverable information that LegalZoom may use to support its claims or defenses  
28 in this action, excluding individuals who are to be used solely for the purposes of

1 impeachment.

2 A. The following current chairman of the board and employees of  
3 LegalZoom:

- 4 1. Brian Liu, Chairman and Co-Founder of LegalZoom.com, Inc.;  
5 c/o Glaser Weil Fink Jacobs Howard Avchen & Shapiro LLP,  
6 10250 Constellation Boulevard, 19th Floor, Los Angeles,  
7 California 90067, (310) 553-3000.
- 8 2. Dorian Quispe, Vice President, Acquisitions of LegalZoom.com,  
9 Inc.; c/o Glaser Weil Fink Jacobs Howard Avchen & Shapiro  
10 LLP, 10250 Constellation Boulevard, 19th Floor, Los Angeles,  
11 California 90067, (310) 553-3000.
- 12 3. Edward Hartman, Chief Strategy Officer & President, Attorney  
13 Services and Co-Founder of LegalZoom.com, Inc.; c/o Glaser  
14 Weil Fink Jacobs Howard Avchen & Shapiro LLP, 10250  
15 Constellation Boulevard, 19th Floor, Los Angeles, California  
16 90067, (310) 553-3000.
- 17 4. Scott MacDonell, Vice President of Marketing for  
18 LegalZoom.com, Inc.; c/o Glaser Weil Fink Jacobs Howard  
19 Avchen & Shapiro LLP, 10250 Constellation Boulevard, 19th  
20 Floor, Los Angeles, California 90067, (310) 553-3000.
- 21 5. Matthew Withers, Director Affiliate Marketing for  
22 LegalZoom.com, Inc.; c/o Glaser Weil Fink Jacobs Howard  
23 Avchen & Shapiro LLP, 10250 Constellation Boulevard, 19th  
24 Floor, Los Angeles, California 90067, (310) 553-3000.

25 These individuals are the current chairman of the board or employees of  
26 LegalZoom and should not be contacted except through counsel for LegalZoom:  
27 Patricia L. Glaser and Fred D. Heather, Glaser Weil Fink Jacobs Howard Avchen &  
28 Shapiro LLP, 10250 Constellation Boulevard, 19th Floor, Los Angeles, California

1 90067, (310) 552-3000. The aforementioned individuals are knowledgeable and are  
2 expected to have information regarding LegalZoom's marketing, advertisements and  
3 promotions as well as LegalZoom's business operations.

4  
5 Dated: September 26, 2013

Respectfully submitted,

6  
7 By: /s/ Fred D. Heather  
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**LEGALZOOM.COM, INC.**