

1 PATRICIA L. GLASER - State Bar No. 55668
 pglaser@glaserweil.com
 2 FRED D. HEATHER - State Bar No. 110650
 fheather@glaserweil.com
 3 MARY ANN T. NGUYEN – State Bar No. 269099
 mnguyen@glaserweil.com
 4 GLASER WEIL FINK JACOBS
 HOWARD AVCHEN & SHAPIRO LLP
 5 10250 Constellation Boulevard, 19th Floor
 Los Angeles, California 90067
 6 Telephone: (310) 553-3000
 Facsimile: (310) 556-2920

7 Attorneys for Plaintiff
 8 LegalZoom.com, Inc.

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

Glaser Weil Fink Jacobs
 Howard Avchen & Shapiro LLP

12
 13 LEGALZOOM.COM, INC., a Delaware
 corporation

14 Plaintiff,

15 v.

16 ROCKET LAWYER INCORPORATED,
 a Delaware corporation

17 Defendant.

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

**JOINT STIPULATION TO
 CONTINUE THE TRIAL AND
 DISCOVERY DATES SET IN THE
 COURT’S OCTOBER 6, 2013
 ORDER FOR GOOD CAUSE**

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

Action Filed: November 20, 2012

1 Defendant Rocket Lawyer Incorporated (“Rocket Lawyer”) and Plaintiff
2 LegalZoom, Inc. (“LegalZoom”), by and through their respective counsel of record,
3 hereby agree and stipulate as follows:

- 4 1. LegalZoom filed its original Complaint on November 20, 2012.
- 5 2. Rocket Lawyer filed its Answer and Counterclaims on December 17,
6 2012.
- 7 3. LegalZoom answered Rocket Lawyer’s Counterclaims and filed its First
8 Amended Complaint (“FAC”) on January 7, 2013.
- 9 4. Rocket Lawyer answered the FAC on February 11, 2013.
- 10 5. On March 11, 2013, Rocket Lawyer served interrogatories, requests for
11 production, and requests for admission.
- 12 6. On March 12, 2013, LegalZoom served interrogatories, requests for
13 production, and requests for admission.
- 14 7. On April 8, 2013, the parties filed their Rule 26(f) Joint Report of
15 Counsel agreeing on case deadlines as required by the Court’s scheduling order.
- 16 8. On or about April 9, 2013, the parties agreed to mediate the case and
17 agreed to stay all discovery deadlines pending mediation.
- 18 9. On April 10, 2013, the Court entered an order staying discovery pending
19 mediation.
- 20 10. On April 11, 2013, the Court entered its Case Management and
21 Scheduling Order in this case.
- 22 11. Beginning in April of 2013 and continuing up to August 22, 2013, the
23 parties engaged in good faith efforts to mediate and settle this action with the
24 assistance of a mediator. The parties met for mediation on May 28, 2013, and
25 conferred for several hours; however, no settlement was reached. Also during this
26 period, the parties continued to discuss settlement with the assistance of the mediator,
27 as well as arranged meetings between the principals of the parties and exchanged
28

1 additional settlement demands. As a result of these efforts, discovery remained
2 stayed throughout the negotiation period.

3 12. On August 22, 2013, after a final exchange of settlement demands, the
4 parties decided to terminate the mediation effort.

5 13. On September 4, 2013, Plaintiff filed a motion for summary judgment.

6 14. On September 23, 2013, the parties responded to the written discovery.

7 15. After reviewing each other's discovery responses, the parties conferred
8 and agree that additional time is necessary to complete discovery.

9 16. On October 2, 2013, the parties jointly stipulated to an extension of the
10 Court's April 11, 2013 Scheduling Order deadlines by approximately 120 days.

11 17. On October 6, 2013, the Court entered an order granting the parties' joint
12 stipulation to continue the trial and discovery dates set in the Court's April 11, 2013
13 Scheduling Order.

14 18. After full briefing by the parties, the Court issued a ruling on Plaintiff's
15 Summary Judgment Motion on October 17, 2013.

16 19. Since October 2013 and continuing now, the parties have been
17 supplementing their discovery requests and responses and engaging in third-party
18 discovery.

19 20. The parties have also met and conferred on numerous occasions in an
20 effort to resolve various discovery issues and disputes.

21 21. Having reduced a significant number of discovery disputes, the parties
22 will commence rolling document productions on January 24, 2014.

23 22. The parties now agree that an additional extension of the Court's
24 Scheduling Order by at least 60 days is required to permit the parties to complete fact
25 and expert discovery and properly prepare for trial.

26 23. Trial of this case is currently scheduled to begin on July 1, 2014, and—as
27 shown in the table provided below—this Stipulation and Proposed Order is filed more
28 than a week in advance of any deadlines in this case.

1 **NOW, THEREFORE**, Rocket Lawyer and LegalZoom hereby stipulate and
 2 agree that all deadlines be extended approximately 60 days, and agree to modify the
 3 Court’s Scheduling Order as follows:
 4

Matter	Current Deadline	Weeks before trial	Proposed New Deadline
Trial Estimated length: 4-5 days	July 1, 2014 at 8:30 a.m.		October 6, 2014 or as soon thereafter as the Court’s calendar permits
Hearing on Motions in Limine; Hearing on Disputed Jury Instructions	June 23, 2014	-1	September 29, 2014
File Findings of Fact and Conclusions of Law; Hearing on Motions in Limine	June 23, 2014	-1	September 29, 2014
Pretrial Conference; Motions in Limine to be filed; Proposed Voir Dire Qs Lodged and Agreed-to Statement of Case	June 2, 2014	-4	September 8, 2014
Lodge Pretrial Conf. Order; File Memo of Contentions of Fact and Law; Exhibit & Witness Lists; File Status Report re Settlement; File Agreed Upon Set of Jury Instructions and Verdict Forms; File Joint Statement re Disputed Instructions, Verdicts, etc.	May 19, 2014	-6	August 18, 2014
Last date to conduct Settlement Conference	April 21, 2014	-8	August 11, 2014
Last day for hearing motions	April 14, 2014	-9	July 1, 2014
Discovery cut-off [Note: Expert disclosure no later than 70 days prior to this date.]	April 7, 2014	-10	June 24, 2014

JOINT STIPULATION TO CONTINUE THE TRIAL AND DISCOVERY DATES SET IN THE COURT’S
 OCTOBER 6, 2013 ORDER FOR GOOD CAUSE

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

IT IS SO STIPULATED:

Dated: January 21, 2014

By: /s/Hong-An Vu (with permission)
Forrest A. Hainline III (SBN 64166)
fhainline@goodwinprocter.com
Hong-An Vu (SBN 266268)
hvu@goodwinprocter.com
GOODWIN PROCTER LLP
Three Embarcadero Center, 24th Floor
San Francisco, California 94111
Tel.: 415.733.6000
Fax.: 415.677.9041

Michael T. Jones (SBN 290660)
mjones@goodwinprocter.com
GOODWIN PROCTER LLP
135 Commonwealth Drive
Menlo Park, California 94025-1105
Tel.: 650.752.3100
Fax.: 650.853.1038

Attorneys for Defendant
ROCKET LAWYER INCORPORATED

Dated: January 21, 2014

By: /s/ Mary Ann T. Nguyen
Patricia L. Glaser
pglaser@glaserweil.com
Fred D. Heather
fheather@glaserweil.com
Mary Ann T. Nguyen
mnguyen@glaserweil.com
**GLASER WEIL FINK JACOBS
HOWARD AVCHEN & SHAPIRO
LLP**
10250 Constellation Boulevard,
19th Floor
Los Angeles, California 90067
Tel.: (310) 553-3000

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Fax.: (310) 556-2920

Attorneys for Plaintiff
LEGALZOOM.COM, INC.

1 **CERTIFICATE OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the County of Los Angeles, State of California; I am over the
4 age of 18 and not a party to the within action; my business address is 10250
5 Constellation Boulevard, 19th Floor, Los Angeles, California 90067.

6 On January 21, 2014, I electronically filed the following document(s) using the
7 CM/ECF system.

8 **JOINT STIPULATION TO CONTINUE THE TRIAL AND DISCOVERY**
9 **DATES SET IN THE COURT’S OCTOBER 6, 2013 ORDER FOR GOOD**
10 **CAUSE**

11 Participants in the case are registered CM/ECF users and will be served by the
12 CM/ECF system.

13 I declare that I am employed in the office of a member of the bar of this court at
14 whose direction the service was made. I declare under penalty of perjury that the
15 above is true and correct.

16 Executed on January 21, 2014 at Los Angeles, California.

17
18 _____
19 /s/ Fred Heather
20 Fred Heather

Glaser Weil Fink Jacobs
Howard Avchen & Shapiro LLP