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*Lodged
 proposed
 ORDER*

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 U.S. DISTRICT COURT
 CENTRAL DISTRICT OF CALIF.
 LOS ANGELES
[Signature]

FILED

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25 *Attorneys for Defendant*
 26 **ROCKET LAWYER INCORPORATED**

27 **UNITED STATES DISTRICT COURT**
 28 **CENTRAL DISTRICT OF CALIFORNIA**
WESTERN DIVISION

29 LEGALZOOM.COM, INC., a Delaware
 30 corporation,
 31 Plaintiff,
 32
 33 v.
 34 ROCKET LAWYER
 35 INCORPORATED, a Delaware
 36 corporation,
 37 Defendant.

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

**APPLICATION FOR AN ORDER
 GRANTING LEAVE TO FILE
 DOCUMENTS UNDER SEAL**

Date: August 18, 2014
 Time: 9:30 a.m.
 Judge: Judge Gary A. Fees
 Courtroom: 740
 255 East Temple Street
 Los Angeles, CA 90012
 Action Filed: November 20, 2012

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD HEREIN:**

2 **NOTICE IS HEREBY GIVEN** that in accordance with Local Rule 79-5.1,
3 Defendant Rocket Lawyer Incorporated (“Defendant”) will and hereby does apply
4 for an order permitting them to file under seal the following:

- 5 1) Unredacted Rocket Lawyer Incorporated’s Motion For Summary Judgment
6 And/Or Adjudication; Memorandum Of Points And Authorities In Support
7 Thereof (the “Motion”);
8 2) Exhibits F-L to the Declaration of Hong-An Vu in Support of Motion for
9 Summary Judgment; and
10 3) Rocket Lawyer Incorporated’s Separate Statement Of Undisputed Facts In
11 Support Of Its Motion For Summary Judgment And/Or Adjudication (the
12 “SSUF”).

13 This application is made pursuant to Local Rule 79-5 et seq. and the
14 Stipulated Protective Order, entered on September 24, 2013 (ECF No. 39), and is
15 based on the below reasons, the Motion, the Separate Statement of Undisputed
16 Facts, and the Exhibits, the pleadings, papers and records on file in this action, and
17 any oral and documentary evidence and argument as presented at the hearing.

18 **REASONS SUPPORTING RELIEF REQUESTED**

19 Good cause exists to seal the Motion, the SSUF, and Exhibits F-L. These
20 documents are subject to the Court’s protective order and the sealing of these
21 documents is necessary in order to protect information that Rocket Lawyer has
22 designated as “confidential” or “attorneys’ eyes only,” including without limitation,
23 confidential business information and other sensitive business data relating to
24 Rocket Lawyer Incorporated. *See* Protective Order, ECF No. 39, at 5-7.

25 **CONCLUSION**

26 For the foregoing reasons, Rocket Lawyer respectfully requests that the Court
27 order the Motion, Exhibits F-L, and the SSUF be filed under seal.

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Dated: June 30, 2014

GOODWIN PROCTER LLP

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