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Attorneys for Plaintiff
LegalZoom.com, Inc.
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

LEGALZOOM.COM, INC., a Delaware corporation,

Plaintiff,
v.

ROCKET LAWYER INCORPORATED, a Delaware corporation,

Defendant.

CASE NO.: CV 12-9942-GAF (AGRx)
Hon. Gary A. Feess
Courtroom: 740
DECLARATION OF DORIAN
QUISPE IN SUPPORT OF MOTION FOR PARTIAL SUMMARY JUDGMENT BROUGHT BY PLAINTIFF LEGALZOOM.COM, INC.

Date: $\quad$ August 18,2014
Time: $\quad 9: 30$ a.m.
Courtroom: 740
Notice of Motion and Motion;
Proposed Statement of Uncontroverted Facts; Declarations of Aaron P. Allan, Travis Giggy; Appendix of Exhibits; and (Proposed) Order filed concurrently herewith]

Complaint Filed: November 20, 2012

## DECLARATION OF DORIAN QUISPE

I, DORIAN QUISPE, declare and state as follows:

1. I submit this declaration in support of the Motion for Partial Summary Judgment brought by Plaintiff LegalZoom.com, Inc. ("LegalZoom"). I am over the age of 18 years. Unless otherwise indicated, I have personal knowledge of the facts set forth herein, and if called upon to testify thereto, I could and would competently do so under oath.
2. I am currently employed by LegalZoom. From August 2013 to the present, I have held the title of Vice President, Acquisition for LegalZoom. From June 2011 to July 2013, I held the title of Senior Director, Online Media \& Marketing for LegalZoom.
3. As part of my duties and responsibilities for LegalZoom, I have become familiar with Legalspring.com, an affiliate referral site which was formerly owned and moderated by Travis Giggy, and which Mr. Giggy sold to Inenvi, Inc. in March 2013. From time to time, my subordinates or I have been involved in day to day communications with representatives of Legalspring.com, including Mr. Giggy, and Inenvi, Inc. The relationship between Legalspring.com and LegalZoom is, and always has been, that of affiliate and client.
4. LegalZoom has not authored any of the reviews on Legalspring.com, and has no responsibility for the reviews which are actually posted.
5. To the extent that consumers visit LegalZoom's web site as a result of having first visited Legalspring.com, LegalZoom has provided compensation to Legalspring.com.
6. While Mr. Giggy, at one time, received compensation from LegalZoom for any products sold by LegalZoom as a result of a consumer first visiting Legalspring.com, that relationship terminated as of March 2013.
7. Like other affiliate referral sites, Legalspring.com has received commissions and/or other compensation from its affiliates, including from

LegalZoom.
8. The only website content on Legalspring.com for which I am informed and believe that LegalZoom provided any authorship is the disclaimer which appears at the bottom of the first web page which states:

Reviews may be added or removed at third party sites' request. All reviews are actual users of this Site or third party sites and were authorized for display by the actual customer. The moderator of this Site has affiliate relationships with third party sites reviewed on this Site.

I declare under penalty of perjury under the laws of the United States of America and the laws of the State of California that the foregoing is true and correct. Executed on July 11, 2014 in Cen Sale, Galifonta.


