

1 PATRICIA L. GLASER - State Bar No. 55668
 2 pglaser@glaserweil.com
 3 FRED D. HEATHER - State Bar No. 110650
 4 fheather@glaserweil.com
 5 GLASER WEIL FINK
 6 HOWARD AVCHEN & SHAPIRO LLP
 7 10250 Constellation Boulevard, 19th Floor
 8 Los Angeles, California 90067
 9 Telephone: (310) 553-3000
 10 Facsimile: (310) 556-2920

11 Attorneys for Plaintiff
 12 LegalZoom.com, Inc.

13 UNITED STATES DISTRICT COURT
 14 CENTRAL DISTRICT OF CALIFORNIA
 15 WESTERN DIVISION

16 LEGALZOOM.COM, INC., a Delaware
 17 corporation,

18 Plaintiff,

19 v.

20 ROCKET LAWYER INCORPORATED,
 21 a Delaware corporation,

22 Defendants.

CASE NO.: CV 12-9942-GAF (AGR_x)

**PLAINTIFF LEGALZOOM.COM,
 INC.'S APPLICATION FOR AN
 ORDER GRANTING LEAVE TO
 FILE DOCUMENTS UNDER SEAL**

Date: August 18, 2014
 Time: 9:30 a.m.
 Judge: Hon. Gary A. Feess
 Courtroom: 740
 Action Filed: November 20, 2012

[Memorandum of Points and
 Authorities; Statement of Genuine
 Disputes; Declaration of Patricia J.
 Winograd, Declaration of Alan Goedde,
 Declaration Dr. Bruce Isaacson and
 Notice of Lodging]

Glaser Weil Fink Jacobs
 Howard Avchen & Shapiro LLP

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

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORDS HEREIN:
2 NOTICE IS HEREBY GIVEN that in accordance with Local Rule 79-5.1, of
3 the Central District of California, Plaintiff LegalZoom.com, Inc. (“LegalZoom”)
4 hereby applies for an order permitting them to file under seal the following:

5 1) Plaintiff LegalZoom.com, Inc.’s Statement of Genuine Disputes
6 (Unredacted) in Opposition to Rocket Lawyer Incorporated’s Motion for Summary
7 Judgment and/or Adjudication; and

8 2) Declaration of Patricia J. Winograd (Unredacted) in Support of
9 LegalZoom.com, Inc.’s Opposition to Rocket Lawyer Incorporated’s Motion for
10 Summary Judgment and/or Adjudication.

11 This application is made pursuant to Local Rule 79-5 et seq. and the Stipulated
12 Protective Order, entered on September 24, 2013 (ECF No. 39), and is based on those
13 reasons, the Statement of Genuine Disputes and the Declaration of Patricia J.
14 Winograd.

15 **REASONS SUPPORTING RELIEF REQUESTED**

16 Good cause exists to seal the Statement of Genuine Disputes and the
17 Declaration of Patricia J. Winograd. These documents are subject to the Court’s
18 protective order and the sealing of these documents is necessary in order to protect
19 information that Rocket Lawyer has designated as “confidential” or “attorneys’ eyes
20 only,” including without limitation, confidential business information and other
21 sensitive business data relating to Rocket Lawyer Incorporated. See Protective Order,
22 ECF No. 39, at 5-7.

23 ///

24 ///

25 ///

26 ///

27 ///

28

1 **CONCLUSION**

2 For the foregoing reasons, LegalZoom.com, Inc. respectfully requests that the
3 Court order its Statement of Genuine Disputes and the Declaration of Patricia J.
4 Winograd be filed under seal.

5
6 DATED: July 24, 2014

Respectfully submitted,

7 GLASER WEIL FINK JACOBS
8 HOWARD AVCHEN & SHAPIRO LLP

9 By: _____ /s/ Fred Heather

10 PATRICIA L. GLASER
11 FRED D. HEATHER
12 PATRICIA J. WINOGRAD
13 Attorneys for Plaintiff
14 LegalZoom.com, Inc.
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Glaser Weil Fink Jacobs
Howard Avchen & Shapiro LLP