

1 Forrest A. Hainline III (SBN 64166)  
*fhainline@goodwinprocter.com*  
2 Hong-An Vu (SBN 266268)  
*hvu@goodwinprocter.com*  
3 **GOODWIN PROCTER LLP**  
Three Embarcadero Center  
4 24th Floor  
San Francisco, California 94111  
5 Tel.: 415.733.6000  
Fax.: 415.677.9041

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

10 Brian W. Cook (*Pro Hac Vice*)  
*bcook@goodwinprocter.com*  
11 **GOODWIN PROCTER LLP**  
53 State Street  
12 Boston, MA 02109-2802  
13 Tel.: 617.570.1000  
Fax.: 617.523.1231

14 *Attorneys for Defendant*  
15 **ROCKET LAWYER INCORPORATED**

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

19  
20 LEGALZOOM.COM, INC., a Delaware  
21 corporation,

22 Plaintiff,

23 v.

24 ROCKET LAWYER  
25 INCORPORATED, a Delaware  
corporation,

26 Defendant.

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

**DECLARATION OF HONG-AN VU  
IN OPPOSITION TO  
LEGALZOOM.COM, INC.'S  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

Date: August 18, 2014

Time: 9:30 a.m.

Judge: Judge Gary A. Feess

Courtroom: 740

255 East Temple Street  
Los Angeles, CA 90012

Action Filed: November 20, 2012

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

**DECLARATION OF HONG-AN VU**

I, Hong-An Vu, declare as follows:

1. I am an associate at Goodwin Procter LLP, counsel of record for defendant and counterclaimant Rocket Lawyer Incorporated (“Rocket Lawyer”). I submit this declaration in support of Rocket Lawyer’s Motion for Summary Judgment and/or Adjudication (the “Motion”). I am over the age of 18 years. Unless otherwise indicated, I have personal knowledge of the matters stated herein and, if called upon to do so, I could and would competently testify to them under oath.
2. Attached hereto as **Exhibit 1** is a true and correct copy of an email from LegalZoom to Travis Giggy, dated July 17, 2012, beginning Bates Number GIG02188.
3. Attached hereto as **Exhibit 2** is a true and correct copy of an email chain between Scott MacDonnell and Travis Giggy, dated January 2009, beginning Bates Number GIG02399.
4. Attached hereto as **Exhibit 3** is a true and correct copy of an internal LegalZoom email chain, dated October 2011, beginning Bates Number LZ001543.
5. Attached hereto as **Exhibit 4** is a true and correct copy of the Affiliate Agreement between LegalZoom.com, Inc. and Own Vision, LLC (d/b/a Legalspring.com), beginning Bates Number LZ001625.
6. Attached hereto as **Exhibit 5** is a true and correct copy of an internal LegalZoom email chain, dated February 15, 2012, beginning Bates Number LZ001791.
7. Attached hereto as **Exhibit 6** is a true and correct copy of an internal LegalZoom email chain, dated March, 2012, beginning Bates Number LZ001988.
8. Attached hereto as **Exhibit 7** is a true and correct copy of an internal LegalZoom email chain, dated November, 2006, discussing an included email from Travis Giggy to Brian Lee, dated November 14, 2006, beginning Bates Number LZ007432.

1           9.       Attached hereto as **Exhibit 8** is a true and correct copy of an email  
2 chain between Brian Liu and Travis Giggy, dated May 2006, beginning Bates  
3 Number LZ007437.

4           10.      Attached hereto as **Exhibit 9** is a true and correct screenshot of a  
5 putative customer review (by “Dr. Mark S.”) posted on  
6 <http://www.legalspring.com/Site.aspx?site=1&sitename=LegalZoom>,  
7 Legalspring.com’s review page for LegalZoom incorporation services.

8           11.      Attached hereto as **Exhibit 10** is a true and correct copy of a letter from  
9 counsel for LegalZoom to counsel for Rocket Lawyer, dated December 18, 2013.

10          12.      Attached hereto as **Exhibit 11** is a true and correct screenshot of the  
11 Better Business Bureau’s internet listing for Own Vision LLC, showing alternate  
12 business names of Legalspring.com and Smallbusinessvictory.com.

13          13.      Attached hereto as **Exhibit 12** is a true and correct copy of an email  
14 chain between Brian Liu and Travis Giggy, dated May 2010, beginning Bates  
15 Number LZ000753.

16          14.      Attached hereto as **Exhibit 13** is a true and correct copy of an email  
17 from Travis Giggy to Scott MacDonell, copying Brandon Molina, dated July 25,  
18 2011, beginning Bates Number LZ000924.

19          15.      Attached hereto as **Exhibit 14** is a true and correct copy of an email  
20 chain involving Travis Giggy and various LegalZoom employees, dated December  
21 2011, beginning Bates Number LZ001127.

22          16.      Attached hereto as **Exhibit 15** is a true and correct copy of an email  
23 from Travis Giggy to Scott MacDonell and Dorian Quispe, dated February 1, 2012,  
24 beginning Bates Number LZ001196.

25          17.      Attached hereto as **Exhibit 16** is a true and correct copy of an email  
26 from Scott MacDonell to Travis Giggy, copying other LegalZoom employees, dated  
27 February 22, 2012, beginning Bates Number LZ001229.

28

1           18.     Attached hereto as **Exhibit 17** is a true and correct copy of an email  
2 chain between Travis Giggy and Scott MacDonell, copying various LegalZoom  
3 employees, dated February 2012, beginning Bates Number LZ001238.

4           19.     Attached hereto as **Exhibit 18** is a true and correct copy of an email  
5 from Scott MacDonell to Travis Giggy, dated April 4, 2012, beginning Bates  
6 Number LZ001342.

7           20.     Attached hereto as **Exhibit 19** is a true and correct copy of an internal  
8 LegalZoom email chain, dated August 2010, beginning Bates Number LZ001485.

9           21.     Attached hereto as **Exhibit 20** is a true and correct copy of an email  
10 from Scott MacDonell to Brian Liu, dated October 7, 2011, forwarding an email  
11 from Travis Giggy, dated October 6, 2011, beginning Bates Number LZ001549.

12          22.     Attached hereto as **Exhibit 21** is a true and correct copy of an email  
13 from Scott MacDonell to Peter Prucnel, dated October 11, 2011, forwarding an  
14 email from Travis Giggy, dated October 10, 2011, beginning Bates Number  
15 LZ001553.

16          23.     Attached hereto as **Exhibit 22** is a true and correct copy of a screenshot  
17 of Legalspring.com's review page for The Company Corporation, dated December  
18 11, 2012, beginning Bates Number RLI0063406.

19          24.     Attached hereto as **Exhibit 23** is a true and correct copy of a  
20 Legalspring.com press release, dated June 23, 2004, beginning Bates Number  
21 RLI0063423.

22          25.     Attached hereto as **Exhibit 24** is a true and correct copy of a screenshot  
23 of a LegalZoom advertisement on Offer.com, dated January 27, 2014, beginning  
24 Bates Number RLI0063426.

25          26.     Attached hereto as **Exhibit 25** is a true and correct copy of a screenshot  
26 of LegalZoom promotional offers on PocketDeal.com, dated January 27, 2014,  
27 beginning Bates Number RLI0063428.

28

1           27. Attached hereto as **Exhibit 26** is a true and correct copy of a screenshot  
2 of Legalspring.com's review page for BizFilings, dated July 9, 2014, beginning  
3 Bates Number RLI0063436.

4           28. Attached hereto as **Exhibit 27** is a true and correct copy of a screenshot  
5 of Legalspring.com's review page for CorpCreations, dated July 9, 2014, beginning  
6 Bates Number RLI0063444.

7           29. Attached hereto as **Exhibit 28** is a true and correct copy of a screenshot  
8 of Legalspring.com's review page for LegalFilings.com, dated July 9, 2014,  
9 beginning Bates Number RLI0063449.

10          30. Attached hereto as **Exhibit 29** is a true and correct copy of a screenshot  
11 of Legalspring.com's review page for MyCorporation.com, dated July 9, 2014,  
12 beginning Bates Number RLI0063487.

13          31. Attached hereto as **Exhibit 30** is a true and correct copy of a screenshot  
14 of Legalspring.com's review page for The Company Corporation, dated July 9,  
15 2014, beginning Bates Number RLI0063502.

16          32. Attached hereto as **Exhibit 31** is a true and correct copy of a screenshot  
17 of LegalZoom promotional offers on TheRawFeed.com, dated January 27, 2014,  
18 beginning Bates Number RLI0063509.

19          33. Attached hereto as **Exhibit 32** is a true and correct screenshot of a  
20 putative customer review (by "Linda H.") posted on  
21 <http://www.legalspring.com/Site.aspx?site=1&sitename=LegalZoom>,  
22 Legalspring.com's review page for LegalZoom incorporation services, beginning  
23 Bates Number RLI0063525.

24          34. Attached hereto as **Exhibit 33** is a true and correct screenshot of a  
25 putative customer review (by "Matt S.") posted on  
26 <http://www.legalspring.com/Site.aspx?site=1&sitename=LegalZoom>,  
27 Legalspring.com's review page for LegalZoom incorporation services, beginning  
28 Bates Number RLI0063526.

1           35. Attached hereto as **Exhibit 34** is a true and correct copy of  
2 LegalZoom's Supplemental Response to Rocket Lawyer's Interrogatory No. 7,  
3 dated December 3, 2013.

4           36. Attached hereto as **Exhibit 35** is a true and correct copy of  
5 LegalZoom's Response to Rocket Lawyer's Interrogatory Nos. 5 and 6 dated  
6 September 23, 2014.

7           I declare under penalty of perjury under the laws of the State of California  
8 that the foregoing is true and correct. Executed on this 28th day of July, 2014.

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

/s/ Hong-An Vu  
HONG-AN VU

---