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11 Attorneys for Plaintiff
 12 LegalZoom.com, Inc.

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

Glaser Weil Fink Jacobs
 Howard Avchen & Shapiro LLP

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

18 Plaintiff,

19 v.

20 ROCKET LAWYER INCORPORATED,
 21 a Delaware corporation

22 Defendant.

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

**JOINT STIPULATION TO TAKE
 CERTAIN DEPOSITIONS AFTER
 THE EXISTING DISCOVERY
 CUT-OFF DATE**

Judge: Judge Gary A. Feess
 Courtroom: 740
 Place: 255 East Temple St.
 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. On or about April 9, 2013, the parties agreed to mediate the case and
6 agreed to stay all discovery deadlines pending mediation.

7 3. On April 10, 2013, the Court entered an order staying discovery pending
8 mediation.

9 4. On April 11, 2013, the Court entered its Case Management and
10 Scheduling Order in this case.

11 5. Beginning in April of 2013 and continuing up to August 22, 2013, the
12 parties engaged in good faith efforts to mediate and settle this action with the
13 assistance of a mediator. On August 22, 2013, after a final exchange of settlement
14 demands, the parties decided to terminate the mediation effort. Discovery remained
15 stayed throughout the negotiation period.

16 6. On October 6, 2013, the Court entered an order granting the parties’ joint
17 stipulation to continue the trial and discovery dates set in the Court’s April 11, 2013
18 Scheduling Order. As a result, the discovery cut-off for this case was set for April 7,
19 2014.

20 7. On January 22, 2014, the Court entered an order granting the parties’
21 joint stipulation to continue the trial and discovery dates set in the Court’s October 6,
22 2013 Scheduling Order. As a result, the discovery cut-off for this case was set for
23 June 24, 2014.

24 8. On April 15, 2014, the Court entered an order granting LegalZoom’s ex
25 parte application to continue the trial and related dates set in the Court’s January 22,
26 2014 Scheduling Order. As a result, the discovery cut-off for this case was set for
27 August 12, 2014.

1 9. Since October 2013, the parties have been engaging in discovery,
2 including the production of documents and third-party discovery.

3 10. The parties have also recently filed cross- Motions for Summary
4 Judgment, with reply briefs due August 4, 2014, and a hearing set for August 18,
5 2014.

6 11. The parties wish to schedule and take approximately twelve (12)
7 depositions between them once all the documents have been produced. Based on the
8 schedule of witnesses and counsel, there is not adequate time to schedule and
9 complete those twelve depositions prior to the August 12, 2014 discovery cut-off
10 date. Early August is a popular vacation week, and several key witnesses are
11 unavailable during that time. Permitting these depositions after August 12, 2014, will
12 not affect any of the remaining dates from the Court's April 15, 2014 Order.

13 **BASED ON THE ABOVE**, Rocket Lawyer and LegalZoom hereby stipulate
14 and agree, subject to Court approval, to permit the following twelve depositions to be
15 taken after the Discovery Cut-Off, and on or before September 5, 2014, with the one
16 exception being Dan Nye, whose deposition may be taken on or before September 12,
17 2014:

Deponent	Party Taking Deposition
Rocket Lawyer 30(b)(6) Deposition	LegalZoom
Charley Moore	LegalZoom
Paul Hollerbach	LegalZoom
Dan Nye	LegalZoom
Alisa Weiner	LegalZoom
Pete Franco	LegalZoom
David Baga	LegalZoom
LegalZoom 30(b)(6) Deposition	Rocket Lawyer
Scott MacDonell	Rocket Lawyer

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Deponent	Party Taking Deposition
Brian Liu	Rocket Lawyer
Dorian Quispe	Rocket Lawyer
Travis Giggy	Rocket Lawyer

IT IS SO STIPULATED:

Dated: July 28, 2014

By: /s/Hong-An Vu (with permission)
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Dated: July 28, 2014

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