

EXHIBIT 4
TO THE DECLARATION OF
JACOB T. VELTMAN

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December 9, 2014

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VIA FACSIMILE & EMAIL

David H. Kramer
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650 Page Mill Road
Palo Alto, CA 94304

Re: **LegalZoom.com, Inc. v. Rocket Lawyer Incorporated – USDC Case No. 2:12-CV-09942 – Subpoena to Google**

Dear Counsel:

I write in response to your November 26, 2014 Responses and Objections regarding the deposition subpoena served on Google, Inc., and further to the various communications that I have had with Jacob Veltman to meet and confer regarding those objections.

United States District Judge Gary Feess has ordered in the above matter that LegalZoom be permitted to take third party discovery from Google, Inc. on a limited basis, and we have a limited amount of time by which to complete this and other discovery in the case. By an email sent on December 3, 2014, I provided you with a copy of Judge Feess' order. The subjects for production identified in our subpoena conformed to the narrow parameters of the Court's order. We also provided, at your request, a copy of the protective order entered in this case.

Notwithstanding that any denial by Google of the requested information would be inconsistent with the Court's Order, we agreed as part of a meet and confer effort to limit the scope of the production to 1/1/10 – 12/31/13, and we also agreed to provide you with some information that you requested to assist your search: (a) the Rocket Lawyer email addresses associated with the subject Google adwords account; and (b) the customer ID number, bank reference number or URL transfer number/address associated with the adwords account. In reviewing our documents, we have found the following responsive emails addresses:

cm@rocketlawyer.com

aweiner@rocketlawyer.com

svolkov@rocketlawyer.com

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mike@ppcassociates.com

We were unable to locate any customer ID number, bank reference number or URL transfer number/address associated with the adwords account, but I offered to “work with” Google to help alleviate any burden associated with locating and producing responsive documents. For example, we agreed to accept a declaration from a custodian of records in lieu of live testimony for authenticating any responsive documents produced. We are open to considering other proposals.

In my email dated December 3, 2014, I made clear our desire that Google adhere to the December 17, 2014, date for production, if possible. Part of the reason for our need to expedite the production is that we have a January 16, 2015, deadline to complete all discovery in the case, including a deposition of “Katherine K” who was a Google employee (based on emails communications with Rocket Lawyer) that we have requested be identified by Google. Katherine K. was an instrumental party regarding some of the Rocket Lawyer advertisements that are at issue in this lawsuit and that violated Google’s Offer Not Found Policy. Katherine K’s knowledge, understanding, and actions taken with regards to Rocket Lawyer’s violation of Google’s Offer Not Found Policy are not within the possession of Rocket Lawyer, and are matters that we may appropriately inquire about from her at a deposition once her identity has been produced to us.

We remain willing to work with your firm and with Google to extend out the December 17 production date, but only if I receive some confirmation from your office that the production is proceeding and that Google is not intending to rely upon its objections to avoid producing responsive documents and information. During our December 3 telephone call, Mr. Veltman agreed to get back to me on this subject by December 5. On December 5, Mr. Veltman emailed me to tell me that he had no update, and that he was still discussing the issue internally and would respond “as soon as [he] can.”

Given our January 16, 2015, deadline to complete all discovery, we must insist upon a response by close of business tomorrow, December 10, 2014, confirming Google’s intentions with respect to the subpoena, or we will have no alternative but to begin the process to pursue a motion to compel. Because the original subpoena provided adequate notice under the rules, and was limited in scope to the subjects allowed by the Court order, we would move with respect to that original subpoena and would not have a need to serve any new subpoena (as I mistakenly indicated we planned to do in my email earlier today). We would also seek monetary sanctions based on the legal fees required to bring the motion.

As I previously indicated, we greatly prefer to work this out with Google on a consensual basis rather than to involve the Court with expensive motion practice. But absent hearing from

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you by tomorrow on this subject, you leave us with no alternative but to proceed with motion practice. I look forward to hearing from you as soon as possible on this subject.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Allan', with a long horizontal flourish extending to the right.

AARON P. ALLAN
of GLASER WEIL FINK HOWARD AVCHEN & SHAPIRO LLP

APA:cc