

**EXHIBIT 5**  
**TO THE DECLARATION OF**  
**JACOB T. VELTMAN**

December 11, 2014

*Via E-Mail*

Aaron P. Allan  
Glaser Weil Fink Howard Avchen & Shapiro LLP  
10250 Constellation Blvd.  
19th Floor  
Los Angeles, CA 90067

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

Dear Aaron:

I write in response to your letter dated December 9, 2014. I frankly do not appreciate the false urgency and unreasonable, artificial deadlines you and your colleagues continue to inject in this routine discovery process.

Although the Court authorized additional discovery on November 10, you waited until the day before Thanksgiving to serve Mr. Margolis with a subpoena, and that subpoena demanded his appearance at a deposition only four business days later despite the fact that discovery does not close until January 16, 2015. You similarly waited a week to serve Google with a second subpoena yet demanded that it produce documents the day after Thanksgiving weekend. After Google timely asserted objections despite your unnecessarily compressed time frame, you waited a week before communicating further with my office, at which point you insisted that we call you back that afternoon. After I complied and discussed the subpoena with you that day, you provided a copy of the study necessary for us to evaluate your requests on Friday, December 5. Then on December 9, you demanded that I “confirm[] that the production is proceeding.”

As I communicated to you on Friday, we are continuing to discuss your subpoena with Google and will provide you with a substantive response regarding which documents we are willing to produce as soon as possible. Your insistence that we conclude this process within three business days of having received the study at issue is simply unreasonable. Google is an extremely large corporation and ascertaining what documents are available to be produced, what the burden associated with that production would be, and whether there are privacy or confidentiality concerns relating to those documents takes time, particularly given that Google is a third party and had no familiarity with this dispute until our conversation last week.

Although your subpoenas seek documents that are largely in the possession of Rocket Lawyer Inc. and that therefore should have been sought from Rocket Lawyer, I assure you that they have not been forgotten or ignored and that we will respond to you as soon as possible, and

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within a reasonable time frame. I realize you would prefer to receive Google's production by December 17, but that may not be practicable. Yours are certainly not the only subpoenas currently being processed by Google at this time, and any firm expectation that discovery from Google would be concluded in less than a month from the service of your subpoenas is, again, unreasonable. This case has been pending for more than two years. If there is any urgency in your discovery demands, it is due to your decision to wait until the eleventh hour to seek discovery from Google.

You may opt to short-circuit the meet and confer process and move to compel as you seem to threaten. Doing so, however, will not get you the discovery you seek any faster, and Google will seek redress for your failure to abide by Rule 45's mandate to avoid undue burden on non-parties.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI  
Professional Corporation

Jacob Veltman