

EXHIBIT 7
TO THE DECLARATION OF
JACOB T. VELTMAN

December 18, 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

Dear Aaron:

As we explained in our objections to your subpoenas and during our call today, your subpoenas are problematic in a number of respects.¹ They are both overbroad and unduly burdensome in their repeated requests for “any and all documents,” particularly given that Mr. Margolis, Google Inc. and Google Ventures are non-parties. Google employs many thousands of people and you have not suggested how it could efficiently search for “any and all documents relating to Rocket Lawyer free advertisements” (which is defined in an overly expansive way). Nor have you offered to pay for any of the discovery costs you seek to impose.

Your subpoenas also seek irrelevant information. The study by Google Ventures pertained to Rocket Lawyer’s website, not its use of AdWords. Furthermore, many of the documents you seek, including communications with Rocket Lawyer and work product delivered to Rocket Lawyer, are necessarily in the possession of Rocket Lawyer, and should not be sought through third-party discovery. Any internal Google or Google Ventures documents not in the possession of Rocket Lawyer are of especially questionable relevance.

Your proposal on today’s call that we produce documents in exchange for a vague promise to reevaluate your request for Mr. Margolis’s deposition and additional documents once you have received the production is not acceptable for obvious reasons. However, notwithstanding the problems with the subpoenas and the burdens and costs associated with searching for and producing documents, if you will agree not to seek any additional discovery from Mr. Margolis, Google Ventures and Google Inc., we will agree to conduct a reasonably diligent search for documents relating to Google Ventures’ study of the Rocket Lawyer website’s use of the word “free” in October 2011 and to provide an authenticating declaration for those documents.

¹ The subpoenas to Mr. Margolis and Google Inc. were also procedurally improper. The former was served the day before Thanksgiving and demanded Mr. Margolis’s appearance at a deposition four business days later. The latter demanded a deposition and production of documents the day after Thanksgiving weekend.

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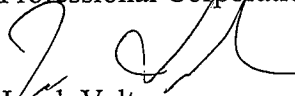
Aaron P. Allan
December 18, 2014
Page 2

Separately, we would agree to provide the name and last known address of "Katherine K." and would not object to a limited deposition of her relating to Rocket Lawyer's use of the word "free" in its AdWords advertising.

Please let me know at your earliest convenience whether this proposal is satisfactory.

Sincerely,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation



Jacob Veltman