

EXHIBIT 8
TO THE DECLARATION OF
JACOB T. VELTMAN

From: Aaron Allan <aallan@glaserweil.com>
Sent: Monday, January 05, 2015 12:02 PM
To: Veltman, Jacob
Cc: Barak Vaughn; Fred Heather; Kramer, David
Subject: RE: LegalZoom v. Rocket Lawyer - Subpoenas to Google, Google Ventures and Michael Margolis

Jake,

LegalZoom is rejecting your proposal, and we will be pursuing a motion to compel.

Aaron P. Allan | Partner
Glaser Weil Fink Howard Avchen & Shapiro LLP
10250 Constellation Blvd., 19th Floor, Los Angeles, CA 90067
Main: 310.553.3000 | Direct: 310.282.6279 | Fax: 310.785.3579

From: Veltman, Jacob [mailto:jveltman@wsgr.com]
Sent: Monday, January 05, 2015 11:54 AM
To: Aaron Allan
Cc: Barak Vaughn; Fred Heather; Kramer, David
Subject: RE: LegalZoom v. Rocket Lawyer - Subpoenas to Google, Google Ventures and Michael Margolis

Aaron,

Pursuant to your request, we sent you a written proposal that would have conclusively resolved your various subpoenas almost three weeks ago. We have yet to hear back from you. We stand by our objections to Mr. Margolis's deposition and will not be appearing on January 9. However, our offer of December 18 is still open.

Best,

Jake

From: Aaron Allan [mailto:aallan@glaserweil.com]
Sent: Monday, January 05, 2015 10:32 AM
To: Veltman, Jacob
Cc: Barak Vaughn; Fred Heather; Kramer, David
Subject: RE: LegalZoom v. Rocket Lawyer - Subpoenas to Google, Google Ventures and Michael Margolis

Jake,

Based on my email of December 18, 2014 (below), and your letter in response, it is my understanding that Michael Margolis will not be appearing to be deposed on January 9, 2015, as commanded by the subpoena that we served. If there has been any change, or if my understanding is incorrect, please let me know by the close of business today so that we can make suitable travel arrangements to Washington to take the deposition.

Aaron P. Allan | Partner
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From: Veltman, Jacob [<mailto:jveltman@wsgr.com>]
Sent: Thursday, December 18, 2014 2:23 PM
To: Aaron Allan
Cc: Barak Vaughn; Fred Heather; Kramer, David
Subject: RE: LegalZoom v. Rocket Lawyer - Subpoenas to Google, Google Ventures and Michael Margolis

Aaron,

Please see the attached.

Best,

Jake

From: Aaron Allan [<mailto:aallan@glaserweil.com>]
Sent: Thursday, December 18, 2014 10:56 AM
To: Veltman, Jacob; Kramer, David
Cc: Barak Vaughn; Fred Heather
Subject: LegalZoom v. Rocket Lawyer - Subpoenas to Google, Google Ventures and Michael Margolis

Dear Counsel,

This will confirm that we had a telephonic meet and confer discussion this morning that lasted approximately 15 minutes. During our discussion, you revealed the following:

1. Google is unwilling to produce communications with Rocket Lawyer because Google takes the position that such documents are already in Rocket Lawyer's possession, and there is no evidence that Rocket Lawyer engaged in spoliation of evidence. When I asked about the burden associated with producing such materials, you refused to provide me with any answer (or to even engage) on that subject. Instead you stated that the issue of burden would be addressed by you only in opposing a motion to compel, and that this was "not a deposition." When I attempted to further meet and confer on that subject, you refused to engage.

2. As part of a compromise, Google would be willing to make a production of all documents relating to the study performed by Michael Margolis and Google Ventures, but would be unwilling to produce any other documents in response to our subpoena (i.e., documents relating to Rocket Lawyer's free advertisements or communications with Rocket Lawyer concerning such advertisements). Google would also be willing to provide the last known contact information for "Katherine K," but is not willing to produce any witness for deposition and would reserve the right to object to the taking of any deposition of Katherine K. You also stated that Mr. Margolis would not be appearing for deposition.

3. You were uncertain whether any of Katherine K's emails or documents remain available at Google, but were told this was "very unlikely" because she was terminated in 2012, well prior to the subpoena. You were therefore unwilling to search for, or produce, Katherine K's emails or other documents.

4. You agreed to put your proposal into written form so that it may be considered by LegalZoom.

Please provide me with Google's written proposal today, or you may alternatively confirm that this email accurately states that proposal. Absent hearing from you by the close of business today, we will assume that Google is are refusing to cooperate in discovery and we will proceed with drafting a joint stipulation for purposes of moving to compel.

Aaron P. Allan | Partner

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