

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

TODD JANSON, et al.,)	
)	
)	
Plaintiffs,)	
)	
v.)	Case No: 10-04018-CV-C-NKL
)	
LEGALZOOM.COM, INC.)	
)	
)	
Defendant.)	

MEMO ON PRETRIAL CONFERENCE

Pursuant to Fed. R. Civ. P. 16, an initial pretrial conference will be held in the above-captioned matter on August 12, 2011.

The following counsel, who will try the case appeared at the conference:

1. For Plaintiff:

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2. For Defendant:

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Accordingly, it is **ORDERED:**

I. STIPULATION OF FACTS.

The parties agree that the following facts are true and undisputed:

- A. LegalZoom is a privately held corporation with its principal place of business in the state of California.
- B. If a radio advertisement or promotion included a radio personality other than someone employed by LegalZoom, it was aired at some time during the class period.

II. EXHIBIT LIST:

The parties submit the following exhibits and have indicated their objections accordingly.¹ (In addition to providing the exhibit list in this Memo on Pretrial Conference, the parties must provide a clean copy of the Exhibit Index to the Courtroom Deputy the morning of trial.)

Plaintiff(s) Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A) - (NA)
1. Documents that Janson received from LegalZoom Plaintiffs 0095-0141 Janson-Ex. 1		A		
2. Janson's Will from LegalZoom Plaintiffs 0001-0009 Janson-Ex. 2		A		
3. Questions from LegalZoom, and Janson's answers LZ 000040-000044 Janson-Ex. 3		A		
4. Screenshot for Janson's payment information Janson-Ex. 4		A		
5. Janson credit-card statement Plaintiffs 0010 Janson-Ex. 6	Foundation, Identification, Authenticity, Relevance, Rule 403	C		
6. C & J Remodeling LLC operating agreement Plaintiffs 0021-0032 Ferrell-Ex. 1		A		

7. C & J Remodeling LLC articles of organization Plaintiffs 0040-0041 Ferrell-Ex. 2		A		
8. LegalZoom home page Plaintiffs 0049-0050 Ferrell-Ex. 4	Relevance, Rule 403	B		
9. questions from LegalZoom, and C & J's answers Ferrell-Ex. 6		A		
10. Notice of Deposition of Representative of LegalZoom.com, Inc. for August 3, 2010 Hartman - Ex. 1		A		
11. LegalZoom.com - About Us Information Hartman - Ex. 2	Relevance, Rule 403	B		
12. LegalZoom.com - Why LegalZoom? Hartman - Ex. 3	Relevance, Rule 403	B		
13. LegalZoom.com - About Us (Our Story) Hartman - Ex. 4	Relevance, Rule 403	B		
14. LegalZoom.com - Why LegalZoom? (About Us) Hartman - Ex. 5	Relevance, Rule 403	B		

<p>15. Corporation or Partnership Registration as Legal Document Assistant County of Los Angeles - LegalZoom.com, Inc. LZ 000178-LZ 000182 Hartman - Ex. 6</p>		A		
<p>16. Legal Document Assistant Bond LZ 000183 - LZ000184 Hartman - Ex. 7</p>		A		
<p>17. Corporation or Partnership Registration as Legal Document Assistant County of Los Angeles for LegalZoom.com, Inc. LZ 000185-LZ 000189 Hartman - Ex. 8</p>		A		
<p>18. Legal Document Assistant Bond for LegalZoom.com, Inc. LZ 000190-LZ 000193 Hartman - Ex. 9</p>		A		
<p>19. Letter to Los Angeles Registrar Recorder-County Clerk regarding Brian Liu serving as General Counsel for LegalZoom.com, Inc. LZ 000195 Hartman - Ex. 10</p>		A		
<p>20. Legal Document Assistant Bond for Brian Liu c/o LegalZoom.com LZ 000196-LZ 000200 Hartman - Ex. 11</p>		A		
<p>21. Chart for Executive Team, Management Team, Operations and Attorney Services Division LZ 000201-LZ000204 Hartman - Ex. 12</p>	Relevance, Rule 403	B		

22. The Last Will and Testament of (Redacted) LZ 000048-LZ 000057 Hartman - Ex. 13		A		
23. New Abstract of Trust LZ 000058-LZ 000060 Hartman - Ex. 13		A		
24. E-mail from DL Customer Support to Chris Cannon regarding Your Last Will Action Required LZ 000045-LZ000046 Hartman - Ex. 14		A		
25. E-mail from DL Customer Support to Chris Cannon regarding Your Last Will and Testament LZ 000047 Hartman - Ex. 15		A		
26. The Last Will and Testament of (Redacted) LZ000087-LZ000095 Hartman - Ex. 16		A		
27. The Last Will and Testament of (Redacted) LZ000096-LZ000105 Hartman - Ex. 17		A		
28. Declaration of Trust (Names Redacted in Black) LZ 000061-LZ000086 Hartman - Ex. 18		A		
29. Durable Power of Attorney of		A		

(Redacted) LZ 000106-LZ 000114 Hartman - Ex. 19				
30. Review Submission- Copyright (Redacted) LZ 000115-LZ 000116 Hartman - Ex. 20		A		
31. Provisional Application for Patent Cover Sheet (Redacted) LZ 000117-LZ 000119 Hartman - Ex. 21		A		
32. Description-Patent (Redacted) LZ 000120-LZ 000126 Hartman - Ex. 22		A		
33. E-mail from Teas@uspto.gov- Trademark (Redacted) LZ 000127-LZ 000136 Hartman - Ex. 23		A		
34. Action by Written Consent of the Incorporator of (Redacted) LZ 000140-LZ000154 Hartman - Ex. 24		A		
35. Operating Agreement (Redacted) LZ 000156-LZ 000166 Hartman - Ex. 25		A		
36. Declaration of Edward R. Hartman Hartman - Ex. 26	Relevance, Rule 403	B		
37. Report of Transactions and Total	Relevance, Rule 403	B		

for December 2004 through December 2009 Hartman - Ex. 27				
38. Letter from The LegalZoom Team to Todd Janson regarding order of Your Last Will & Testament from LegalZoom.com LZ 000025-LZ000027 Hartman - Ex. 28	Relevance, Rule 403	B		
39. The Last Will and Testament of Todd Janson LZ 000028-LZ 000039 Hartman - Ex. 29		A		
40. Order for Todd Janson Last Will and Testament (Premium Package) LZ 000040-LZ000044 Hartman - Ex. 30		A		
41. Letter from The LegalZoom Team to Chad Ferrell regarding order of LLC from LegalZoom.com LZ 000001-LZ 000002 Hartman - Ex. 31	Relevance, Rule 403	B		
42. Supplementary Document Cover Sheet regarding Order #3556309 LZ 000003 Hartman - Ex. 32		A		
43. Articles of Organization for C & J Remodeling LLC LZ 000004 Hartman - Ex. 33		A		
44. Certificate of Organization from the Secretary of State for C & J		A		

Remodeling, LLC LZ 000005 Hartman - Ex. 34				
45. C & J Remodeling LLC Operating Agreement LZ 000006-LZ 000017 Hartman - Ex. 35		A		
46. Order for Chad Ferrell for LLC (Economy Package) LZ 000020-LZ 000023 Hartman - Ex. 36		A		
47. Customer issues that need attention LZ 000024 Hartman - Ex. 37	Relevance, Rule 403	B		
48. Broadcast Scripts for Television for Business Formation, Intellectual Property/Business Formation, Estate Planning and Multiple LZ 000216-LZ 000221 Hartman - Ex. 40	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
49. Broadcast Scripts for Television for Online Legal Services LZ 000222-LZ 000225 Hartman - Ex. 41	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
50. Script - Advertiser: LegalZoom.com; Title: George Noory: 90 Interview #2 LZ 000226-LZ 000234 Hartman - Ex. 42	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
51. Script - Advertiser: LegalZoom.com; Title: George	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		

Noory: 90 Interview #1 LZ 000235-LZ 000243 Hartman - Ex. 43				
52. Copy Points Form - Advertiser: LegalZoom.com; Title: Featured BIZ: 60 #2 Rome LZ 000244-LZ 000248 Hartman - Ex. 44	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
53. Joint Venture Agreement of (Redacted) LZ 000250-LZ 000258 Hartman - Ex. 45		A		
54. Partnership Agreement of (Redacted) LZ 000259-LZ 000268 Hartman - Ex. 46		A		
55. Non Disclosure & Confidentiality Agreement LZ 000269-LZ 000271 Hartman - Ex. 46		A		
56. Certificate of Limited Partnership (Redacted) LZ 000272-LZ 000276 Hartman - Ex. 47		A		
57. Recorder of Deeds (Redacted) LZ 000277-LZ 000279 Hartman - Ex. 48		A		
58. Change of Name Notice (Redacted) LZ 000280-LZ 000284 Hartman - Ex. 49		A		

59. Last Will Suitcase LZ 000490-Lz 000492 Hartman - Ex. 51		A		
60. Last Will Suitcase with surviving spouse LZ 000493-LZ 000495 Hartman - Ex. 52		A		
61. Formation of Individual Living Trust LZ 000475-LZ 000478 Hartman - Ex. 53		A		
62. Joint Living Trust Suitcase LZ 000513-Lz 000522 Hartman - Ex. 54		A		
63. Joint Living Trust Suitcase with surviving spouse LZ 000479-LZ 000487 Hartman - Ex. 55		A		
64. Living Will Healthcare Power of Attorney LZ 000488-LZ 000489 Hartman - Ex. 56		A		
65. Formation of a Limited Partnership Suitcase LZ 000435-LZ 000437 Hartman - Ex. 60		A		
66. Dissolution of a corporation suitcase LZ 000438-Lz 000440		A		

Hartman - Ex. 61				
67. Partnership Agreement Suitcase LZ 0004446-LZ 000448 Hartman - Ex. 62		A		
68. Formation of a Corporation Suitcase LZ 000449-LZ 000452 Hartman - Ex. 63		A		
69. Joint Venture Agreement Suitcase LZ 000453-Lz 000455 Hartman - Ex. 64		A		
70. Formation of an LLC Suitcase LZ 000456-LZ 000459 Hartman - Ex. 65		A		
71. Formation of a Nonprofit Corporation Suitcase LZ 000460-LZ 000463 Hartman - Ex. 66		A		
72. Partnership Agreement Suitcase LZ 000464-LZ 000466 Hartman - Ex. 67		A		
73. Creation of a Deed Suitcase LZ 000496-LZ 000497 Hartman - Ex. 68		A		
74. Warranty Deed Suitcase LZ 000498-LZ 000499 Hartman - Ex. 69		A		

75. Quitclaim Deed, conveyed to a living trust suitcase LZ 000500-LZ 000501 Hartman - Ex. 70		A		
76. Quitclaim Deed, conveyed to a person suitcase LZ 000502-LZ 000503 Hartman - Ex. 71		A		
77. Quitclaim Deed, adding person to title suitcase LZ 000504-LZ 000505 Hartman - Ex. 72		A		
78. Warranty Deed (Redacted) Hartman - Ex. 73		A		
79. Quitclaim Deed Hartman - Ex. 74		A		
80. Udeed, LLC and LegalZoom.com, Inc. Agreement LZ 000581-LZ 00588 Hartman - Ex. 75		A		
81. Pet Protection Agreement Suitcase LZ 000506-LZ 000509 Hartman - Ex. 79		A		
82. Missouri Name Change Suitcase LZ 000591-LZ 000594 Hartman - Ex. 92		A		
83. Missouri Name Change Suitcase		A		

LZ 000595-LZ 000596 Hartman - Ex. 93				
84. Missouri Real Estate Lease Suitcase LZ 000597-LZ 000599 Hartman - Ex. 94		A		
85. LegalZoom.com Index of Suitcases Hartman - Ex. 103	Foundation, Identification, Authenticity, Relevance, Rule 403, Hearsay	C		
86. First Amended Notice of Rule 30(b)(6) Video Deposition of Representative of LegalZoom.com, Inc. for February 16, 2011 Lui - Ex. 50		A		
87. Copyright Application Suitcase LZ 000441-LZ 000445 Lui - Ex. 76		A		
88. Patent Application Suitcase LZ 000467-LZ 000470 Lui - Ex. 77		A		
89. Trademark Application Suitcase LZ 000471-LZ 000474 Lui - Ex. 78		A		
90. Trademark Application Suitcase LZ 000506-LZ 000509 Lui - Ex. 79		A		
91. LegalZoom Attorney Conect		A		

Attorney/Firm Order Form LZ 000565-LZ 000570 Lui - Ex. 85				
92. Service Agreement LZ 000571-LZ 000580 Lui - Ex. 86		A		
93. Health Care Directive (Living Will/Health Care Power of Attorney of (Redacted) LZ 000524-LZ 000532 Lui - Ex. 87		A		
94. Pet Protection Agreement (Redacted) LZ 000537-LZ 000549 Lui - Ex. 88		A		
95. Residential Lease/Rental Agreement for (Redacted) LZ 000550-LZ 000563 Lui - Ex. 89		A		
96. Registration of Fictitious Name LZ 000564 Lui - Ex. 89		A		
97. Certificate of Incorporation (Redacted) LZ 000533-LZ 000536 Lui - Ex. 90		A		
98. Notice of Winding Up for Limited Liability Company (Redacted) LZ 000523 Lui - Ex. 91		A		

99. Banner Ads Lui - Ex. 95	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
100. CD labeled "Online Banner Ads, Print, TV Ads" LZ 000589 Lui - Ex. 96	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164; subject to Stipulation of Fact B., <i>supra</i>	B		
101. Donatwald Broadcast Scripts LZ 000223 Lui - Ex. 97	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
102. CD labeled "Radio Ads" Lui - Ex. 98	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164; subject to Stipulation of Fact B., <i>supra</i>	B		
103. Two Page Script Form: Advertiser: LegalZoom; Title: New Year's Resolution Time Lui - Ex. 99	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
104. Script Ad "Last Will and Testament" Lui - Ex. 100	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
105. CD Labeled "Confidential LegalZoom.com" Lui - Ex. 101	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164; subject to Stipulation of Fact B., <i>supra</i>	B		
106. LegalZoom Power of Attorney FAQs Lui - Ex. 102	Relevance, Rule 403	B		
107. List of Products from Missouri Transactions Spreadsheet Thomas- Ex. 112	Foundation, Identification, Authenticity, Relevance, rule 403	C		

<p>108. Spreadsheet of Questions from Online Questionnaire for Copyright LZ 000629-LZ 000636 Thomas- Ex. 113</p>		A		
<p>109. Grid of LZ Questions for Trademark LZ 000693-LZ 000698 Thomas-Ex. 115</p>		A		
<p>110. Exemplar Document of Trademark Application LZ 000131-LZ 000136 Thomas-Ex. 116</p>		A		
<p>111. Grid of LZ Questionnaire Questions for Provisional Patent Application LZ 000688-692 Thomas-Ex. 117</p>		A		
<p>112. Corporations Questions LZ 000649-LZ 000655 Varghese - Ex. 104</p>		A		
<p>113. DBA Questions LZ 000637-LZ 000645 Varghese - Ex. 105</p>		A		
<p>114. Dissolution Questions LZ 000628 Varghese - Ex. 106</p>		A		
<p>115. Partnership Questions LZ 000681 Varghese - Ex. 107</p>		A		

116. Joint Ventures Questions LZ 000656-LZ 000657 Varghese - Ex. 108		A		
117. Limited Partnership Questions LZ 000625-LZ 000627 Varghese - Ex. 109		A		
118. LLC Questions LZ 000667-LZ 000673 Varghese - Ex. 110		A		
119. Nonprofit Questions LZ 000674-LZ 000680 Varghese - Ex. 111		A		
120. Questions Regarding Missouri Legal Documents LZ 000791-LZ 000800 Jacobo - Ex. 120		A		
121. Divorce Documents LZ 000724-LZ 000790 Jacobo - Ex. 121		A		
122. Last Will Testament Questions LZ 000658-LZ 000663 Jacobo - Ex. 122		A		
123. Living Trust Questions LZ 000611-LZ 000624 Jacobo - Ex. 123		A		
124. Living Will Questions LZ 000664-LZ 000666		A		

Jacobo - Ex. 124				
125. Name Change Questions LZ 000699-LZ 000716 Jacobo - Ex. 125		A		
126. Pet Protection Questions LZ 000682-LZ 000687 Jacobo - Ex. 126		A		
127. Power of Attorney Questions LZ 000646-LZ 000648 Jacobo - Ex. 127		A		
128. Real Estate Transfer Deed Questions LZ 000720-LZ 000723 Jacobo - Ex. 128		A		
129. Real Estate Lease Questions LZ 000717-LZ 000719 Jacobo - Ex. 129		A		
130. CD- Spreadsheet of Missouri Transactions LZ 000801 Loo-Ex. 130		A		
131. "Corporate Form" Product from CD Loo-Ex. 131		A		
132. Waigand CV Waigand- Ex. 1		A		
133.		A		

Waigand Report Waigand-Ex. 2				
134. Compact Disc Waigand-Ex. 5		A		
135. Last Will and Testament (Redacted) Smallwood 000001- 000045 Smallwood-Ex. 3		A		
136. LLC (Limited Liability Co.) (Redacted) Smallwood 000046- 000094 Smallwood-Ex. 4		A		
137. Deed Transfer (Redacted) Smallwood 000095-000121 Smallwood- Ex. 5		A		
138. Trademark Registration (Redacted) Smallwood 000122- 000154 Smallwood- Ex. 6		A		
139. The Last Will & Testament of John Smallwood Smallwood 000155-000171 Smallwood- Ex. 12		A		
140. Articles of Organization Smallwood- Ex. 15		A		
141. Warranty Deed Smallwood 000173-000176 Smallwood- Ex. 18		A		

142. Federal Trademark Application Smallwood- Ex. 20		A		
143. Articles of Incorporation LZ 000802-LZ 000805		A		
144. Application for Registration LLP LZ 000810-LZ 000811		A		
145. Warranty Deed Plaintiffs Motion for Partial Summary Judgment-Ex. 20		A		
146. Declaration of Edward R. Hartman (Redacted) Support of Motion for Summary Judgment	Relevance, Rule 403	B		
147. Advertisement from Dan Patrick	Relevance, Rule 403; <i>see</i> Motion in Limine to Exclude Ads, Doc. 164	B		
148. LegalZoom Spreadsheet- CD LZ 000812		A		
149. LegalZoom Spreadsheet- CD LZ 000813		A		
150. Waigand Calculations re Judge Laughrey's Order related to trademark and patent products	LegalZoom preserves all objections until it can view the document	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
1.	Missouri Form for Motion for Family Access Order (Ardrey Depo. Ex. 1)	Relevance and Rule 403	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
2.	Case Docket information for St. Charles Circuit Case No. 0511-FC01706 Gerald T. Ardrey v. Crystal Jo Bandy (Ardrey Depo. Ex. 2)	Relevance and Rule 403	B		
3.	Missouri Secretary of State's Instructions and Form for Limited Liability Company Articles of Incorporation (Ardrey Depo Ex. 3)	Relevance and Foundation	C		
4.	C & J Remodeling LLC Operating Agreement (LZ 000006-19)		A		
5.	Articles of Organization and Certificate of Organization for C & J Remodeling LLC (Ferrell Depo Ex. 2, Plaintiffs 00040-41; Hartman Depo Exs. LZ 33 and 34, LZ 00004-5)		A		
6.	Missouri Secretary of State's Instructions and Form for General Business Corporation Articles of Incorporation (Ferrell Depo Ex. 3)	Relevance	B		
7.	Suitcase/Document reflecting LLC information entered by M. Ferrell onto LegalZoom.com website (Ferrell Depo Ex. 6, Hartman Depo Ex. LZ 36, LZ 000020-000023)		A		
8.	Last Will and Testament of Todd Janson (Janson Depo Ex. 2, Plaintiffs 0001-0009)		A		
9.	Suitcase/Document reflecting information for Last Will and Testament entered by T. Janson onto LegalZoom.com website (Janson Depo Ex. 3, Hartman Depo Ex. LZ 30, LZ 00040-000044)		A		
10.	Payment Information Page from LegalZoom.com (Janson Depo Ex. 4)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
11.	Legal Zoom Terms of Service printed from its website 11/17/2009 (Janson Depo Ex. 5, Plaintiffs 0088-0089)	See Motions in Limine, doc 148, relevance and Rule 403	B		
12.	Unidentified document produced by Plaintiffs, printed from LegalZoom.com website 11/17/2009 (Janson Depo Ex. 7, Plaintiffs 0051-0059)	Relevance and Rule 403. Documents are unintelligible	C		
13.	Screen prints from Smallwood Technologies website (Smallwood Depo Ex. 1)	Relevance	B		
14.	Declaration of John E. Smallwood (Smallwood Depo Ex. 2)	Hearsay	B		
15.	Screen prints of LegalZoom.com website regarding Last Will and Testament, printed by John Smallwood on March 3, 2011 (Smallwood Depo Ex. 3, Smallwood 000001-000045)	Motion in Limine Doc.148	B		
16.	Screen prints of LegalZoom.com website regarding LLCs, printed by John Smallwood on March 3, 2011 (Smallwood Depo Ex. 4, Smallwood 000046-94)		A		
17.	Screen prints of LegalZoom.com website regarding Deed Transfer, printed by John Smallwood on March 3, 2011 (Smallwood Depo Ex. 5, Smallwood 000095-000121)	Motion in Limine doc 148	B		
18.	Screen prints of LegalZoom.com website regarding Trademark Registration, printed by John Smallwood on March 3, 2011 (Smallwood Depo Ex. 6, Smallwood 000122-000154)	Motion in Limine doc 148	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
19.	Screen print from LegalZoom.com website regarding Wills (Smallwood Depo Ex. 7)	Relevance and Rule 403, Motion in Limine doc 156	B		
20.	LegalZoom Terms of Service printed from its website 07/13/2011 (Smallwood Depo Ex. 8, LZ 000953-958)	Relevance, Rule 403, Motions in Limine Doc 148	B		
21.	LegalZoom Terms of Use printed from its website 07/13/2011 (Smallwood Depo Ex. 9, LZ 000959-968))	Relevance, Rule 403, Motions in Limine Doc 148	B		
22.	Questionnaire Answers by John Smallwood for Last Will and Testament (Smallwood Depo Ex. 10, LZ 000920-922)		A		
23.	LegalZoom.com Last Will and Testament Sample Form (Smallwood Depo Ex. 11, LZ 000969-988)	Relevance, Rule 403, Motion in Limine docs 150 & 156 & Foundation	C		
24.	Last Will and Testament of John Smallwood (Smallwood Depo Ex. 12)		A		
25.	Suitcase/Questionnaire Answers by John Smallwood for LLC (Smallwood Depo Ex. 13, LZ 000918-919)		A		
26.	LegalZoom.com LLC Sample Forms (Smallwood Depo Ex. 14, LZ 000994-1018)	Relevance, Rule 403, Motions in Limine docs 150 & 156 & Foundation	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
27.	Packet containing Articles of Organization and Operating Agreement for Red Hot Technology Consultations, LLC (Smallwood Depo Ex. 15, P344-P374)		A		
28.	Suitcase/Questionnaire Answers by John Smallwood for Deed Transfer (Smallwood Depo Ex. 16, LZ 000923-924)		A		
29.	Screen print of LegalZoom.com website regarding Real Estate Deed Transfer (Smallwood Depo Ex. 17)	Motion in Limine doc 148	B		
30.	Suitcase/Questionnaire Answers by John Smallwood for LLC (Smallwood Depo Ex. 19, LZ 000925-926)		A		
31.	Packet of Correspondence and Documents from LegalZoom.com to John Smallwood regarding Order No. 26458419 for trademark application (Smallwood Depo Ex. 20)	Motion in Limine doc 148	B		
32.	Curriculum Vitae of Richard Waigand (Waigand Depo Ex. 1)		A		
33.	Expert Report of Richard F. Waigand July 6, 2001 (Waigand Depo Ex. 2)		A		
34.	Notice to take Deposition Duces Tecum of Richard F. Waigand, CPA (Waigand Depo Ex. 3)		A		
35.	Expert Witness Statement of Richard F. Waigand, CPA (Waigand Depo Ex. 4)		A		
36.	CD and contents of Waigand Depo Ex. 5 (correspondence and spreadsheet)		A		
37.	Notice of 30(b)(6) Deposition (Hartman Depo Ex. LZ 1)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
38.	Corporate Registration as Legal Document Assistant for LegalZoom.com, Inc., filed in Los Angeles County December 22, 2003 (Hartman Depo Ex. LZ 6, LZ 000178-182)		A		
39.	Legal Document Assistant Bond effective December 18, 2005 (Hartman Depo Ex. LZ 7, LZ 000183-184)		A		
40.	Corporate Registration as Legal Document Assistant for LegalZoom.com, Inc., filed in Los Angeles County February 9, 2006 (Hartman Depo Ex. LZ 8, LZ 000185-189)		A		
41.	Legal Document Assistant Bond effective December 15, 2009 to December 15, 2011 (Hartman Depo Ex. LZ 9, LZ 000190-193)		A		
42.	December 15, 2009 Letter from Charles Rampenthal to Los Angeles County Registrar-Recorder/County Clerk (Hartman Depo Ex. LZ 10, LZ 000195)		A		
43.	Legal Document Assistant Bond filed December 17, 2009 (Hartman Depo Ex. LZ 11, LZ 000196-200)		A		
44.	LegalZoom organizational charts (LZ 000201-204)		A		
45.	Exemplar Last Will and Testament and Joint Living Trust, (LZ 000048-57)		A		
46.	Joint Living Trust, Abstract of Trust (LZ 000058-60)		A		
47.	Exemplar email from LegalZoom Customer Support (Hartman Depo Ex. LZ 14, LZ 000045-46)	Relevance	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
48.	Exemplar email from LegalZoom Customer Support (Hartman Depo Ex. LZ 15, LZ 000047)	Relevance	B		
49.	Exemplar Last Will and Testament (Hartman Depo Ex. LZ 16, LZ 000087-95)	Relevance	B		
50.	Exemplar Last Will and Testament (Hartman Depo Ex. LZ 17, LZ 000096-105)	Relevance	B		
51.	Exemplar Declaration of Trust (Hartman Depo Ex. LZ 18, LZ 000061-86)	Relevance	B		
52.	Exemplar Durable Power of Attorney (Hartman Depo Ex. LZ 19, LZ 000106-114)	Relevance	B		
53.	Exemplar Copyright (Hartman Depo Ex. LZ 20, LZ 000115-116)	Relevance	B		
54.	Exemplar Provisional Application for Patent Cover Sheet (Hartman Depo Ex. LZ 21, LZ 000117-119)	Relevance	B		
55.	Exemplar documents relating to patent application (Hartman Depo Ex. LZ 22, LZ 000120-126)	Relevance	B		
56.	Exemplar email and documents from U.S. Patent and Trademark Office (Hartman Depo Ex. LZ 23, LZ 000127-136)	Relevance	B		
57.	Exemplar Incorporation documents (Hartman Depo Ex. LZ 24, LZ 000140-154)	Relevance	B		
58.	Exemplar Operating Agreement (Hartman Depo Ex. LZ 25, LZ 000156-166)	Relevance	B		
59.	Last Will and Testament of Todd Janson and related Order documents (LZ 000028-36, 38-39)	Relevance	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
60.	Supplementary Document Cover "pull" Sheet (Hartman Depo Ex. LZ 32, LZ 000003)	Relevance	B		
61.	Customer Service Representative Training Document Non-UPL Answers (Hartman Depo Ex. LZ 38, LZ 000210)	Relevance	B		
62.	Customer Service Representative Training Document Customers who need legal advice (Hartman Depo Ex. LZ 39, LZ 000211-215)	Relevance	B		
63.	Exemplar Joint Venture Agreement (Hartman Depo Ex. LZ 45, LZ 000250-258)	Relevance	B		
64.	Exemplar Partnership Agreement (Hartman Depo Ex. LZ 46, LZ 000259-271)	Relevance	B		
65.	Exemplar Missouri Certificate of Limited Partnership with attached Employer Identification Number documents (Hartman Depo Ex. LZ 47, LZ 000272-276)	Relevance	B		
66.	Exemplar recorded Quitclaim Deed (Hartman Depo Ex. LZ 48, LZ 000277-279)	Relevance	B		
67.	Exemplar Change of Name filings (Hartman Depo Ex. LZ 49, LZ 000280-284)	Relevance	B		
68.	First Amended Notice of Rule 30(b)(6) Video Deposition (Liu Depo Ex. LZ 50)		A		
69.	Suitcase/Questionnaire Answers for Last Will Not All to Spouse (Hartman Depo Ex. LZ 51, LZ 000490-492)		A		
70.	Suitcase/Questionnaire Answers for Last Will All to Spouse Hartman Depo Ex. LZ 52, LZ 000493-495)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
71.	Suitcase/Questionnaire Answers for Individual Living Trust (Hartman Depo Ex. LZ 53, LZ 000475-478)		A		
72.	Suitcase/Questionnaire Answers for Joint Living Trust Not All to Spouse (Hartman Depo Ex. LZ 54, LZ 000513-522)		A		
73.	Suitcase/Questionnaire Answers for Joint Living Trust All to Spouse (Hartman Depo Ex. LZ 55, LZ 000479-487)		A		
74.	Suitcase/Questionnaire Answers for Living Will Healthcare Power of Attorney No Life Support (Hartman Depo Ex. LZ 56, LZ 000488-489)		A		
75.	Suitcase/Questionnaire Answers for Certificate of Limited Partnership (Hartman Depo Ex. LZ 60, LZ 000435-437)		A		
76.	Suitcase/Questionnaire Answers for Corporate Dissolution (Hartman Depo Ex. LZ 61, LZ 000438-440)		A		
77.	Suitcase/Questionnaire Answers for DBA Registration (Hartman Depo Ex. LZ 62, LZ 000446-448)		A		
78.	Suitcase/Questionnaire Answers for Incorporation (Hartman Depo Ex. LZ 63, LZ 000449-452)		A		
79.	Suitcase/Questionnaire Answers for Joint Venture Agreement (Hartman Depo Ex. LZ 64, LZ 000453-455)		A		
80.	Suitcase/Questionnaire Answers for LLC Formation (Hartman Depo Ex. LZ 65, LZ 000456-459)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
81.	Suitcase/Questionnaire Answers for Non-Profit Corporation (Hartman Depo Ex. LZ 66, LZ 000460-463)		A		
82.	Suitcase/Questionnaire Answers for Partnership Agreement (Hartman Depo Ex. LZ 67, LZ 000464-466)		A		
83.	Suitcase/Questionnaire Answers for Quitclaim Deed Transfer (LZ 000496-499)		A		
84.	Suitcase/Questionnaire Answers for Warranty Deed Transfer (Hartman Depo Ex. LZ 69, LZ 000498-499)		A		
85.	Suitcase/Questionnaire Answers for Deed Transfer Living Trust (Hartman Depo Ex. LZ 70, LZ 000500-501)		A		
86.	Suitcase/Questionnaire Answers for Deed Transfer Other Person (Hartman Depo Ex. LZ 71, LZ 000502-503)		A		
87.	Suitcase/Questionnaire Answers for Deed Transfer Add Person (Hartman Depo Ex. LZ 72, LZ 000504-505)		A		
88.	Exemplar Warranty Deed (Hartman Depo Ex. LZ 73)		A		
89.	Exemplar Quitclaim Deed (Hartman Depo Ex. LZ 74)		A		
90.	UDEED and LegalZoom.com, Inc. Agreement (Hartman Depo Ex. LZ 75, LZ 000581-588)		A		
91.	Suitcase/Questionnaire Answers for Copyright (Liu Depo Ex. LZ 76, LZ 000441-445)		A		
92.	Suitcase/Questionnaire Answers for Patent Application (Liu Depo Ex. LZ 77, LZ 000467-470)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
93.	Suitcase/Questionnaire Answers for Trademark Application (Liu Depo Ex. LZ 78, LZ 000471-474)		A		
94.	Suitcase/Questionnaire Answers for Pet Protection Agreement (Hartman Depo Ex. LZ 79, LZ 000506-509)		A		
95.	LegalZoom Attorney Connect, Attorney/Firm Order Form (Liu Depo Ex. LZ 85, LZ 000565-570)	Relevance	B		
96.	Sevice Agreement, ProxiLaw, Inc. and LegalZoom.com, Inc. (Liu Depo Ex. LZ 86, LZ 000571-580)		A		
97.	Exemplar Health Care Directive (Liu Depo Ex. LZ 87, LZ 000524-532)		A		
98.	Exemplar Pet Protection Agreement (Liu Depo Ex. LZ 88, LZ 000537-549)		A		
99.	Exemplar Residential Lease/Rental Agreement (Liu Depo Ex. LZ 89, LZ 000550-563)		A		
100.	Exemplar Missouri Certificate and Articles of Incorporation of Nonprofit Corporation (Liu Depo Ex. LZ 90, LZ 000533-536)		A		
101.	Exemplar Missouri Notice of Winding Up for Limited Liability Company (Liu Depo Ex. LZ 91, LZ 000523)		A		
102.	Suitcase/Questionnaire Answers for Name Change MO Adult 1 (Hartman Depo Ex. LZ 92, LZ 000591-594)		A		
103.	Suitcase/Questionnaire Answers for Name Change MO Adult 2 (Hartman Depo Ex. LZ 93, LZ 000595-596)		A		
104.	Suitcase/Questionnaire Answers for Real Estate Lease MO (Hartman Depo Ex. LZ 94, LZ 000597-599)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
105.	Questionnaire Questions for Corporations (Varghese Depo Ex. LZ 104, LZ 000649-655)		A		
106.	Questionnaire Questions for DBA (Varghese Depo Ex. LZ 105, LZ 000637-645)		A		
107.	Questionnaire Questions for Corporate Dissolution (Varghese Depo Ex. LZ 106, LZ 000628)		A		
108.	Questionnaire Questions for Partnership (Varghese Depo Ex. LZ 107, LZ 000681)		A		
109.	Questionnaire Questions for Joint Ventures (Varghese Depo Ex. LZ 108, LZ 000656-657)		A		
110.	Questionnaire Questions for Limited Partnership (Varghese Depo Ex. LZ 109, LZ 000625-627)		A		
111.	Questionnaire Questions for LLC (Varghese Depo Ex. LZ 110, LZ 000667-673)		A		
112.	Questionnaire Questions for Nonprofit (Varghese Depo Ex. LZ 111, LZ 000674-680)		A		
113.	Questionnaire Questions for Copyright (Thomas Depo Ex. LZ 113, LZ 000629-636)		A		
114.	Confirmation page regarding Copyright (Thomas Depo Ex. LZ 114, LZ 000115-116)		A		
115.	Questionnaire Questions for Trademark (Thomas Depo Ex. LZ 115, LZ 000693-698)		A		
116.	Exemplar Trademark Application (Thomas Depo Ex. LZ 116, LZ 000131-136)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
117.	Questionnaire Questions for Provisional Application for Patent (Thomas Depo Ex. LZ 117, LZ 000688-692)		A		
118.	Exemplar Provisional Application for Patent Cover Sheet (Thomas Depo Ex. LZ 118, LZ 000117-119)		A		
119.	Exemplar ABX document and government-generated acknowledgement receipt (Thomas Depo Ex. LZ 119, LZ 000120-126)		A		
120.	Suitcase/Questionnaire Answers for Divorce (Jacobo Depo Ex. 120, LZ 000791-800)		A		
121.	Exemplar Divorce filings (Jacobo Depo Ex. 121, LZ 000724-790)		A		
122.	Questionnaire Questions for Last Will and Testament (Jacobo Depo Ex. 122, LZ 000658-663)		A		
123.	Questionnaire Questions for Living Trust (LZ 000611-624)		A		
124.	Questionnaire Questions for Living Will (Jacobo Depo Ex. 124, LZ 000664-666)		A		
125.	Questionnaire Questions for Name Change (Jacobo Depo Ex. 125, LZ 000699-716)		A		
126.	Questionnaire Questions for Pet Protection Agreement (Jacobo Depo Ex. 126, LZ 000682-687)		A		
127.	Questionnaire Questions for Power of Attorney (Jacobo Depo Ex. 127, LZ 000646-648)		A		
128.	Questionnaire Questions for Real Estate Transfer Deed (Jacobo Depo Ex. 128, LZ 000720-723)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
129.	Questionnaire Questions for Real Estate Lease (Jacobo Depo Ex. 129, LZ 000717-719)		A		
130.	CD, Missouri Transactions Spreadsheet (Loo Depo Ex. 130, LZ 000801)		A		
131.	Printout of transaction information from Missouri Transactions spreadsheet (Loo Depo Ex. 131)		A		
132.	Suitcase/Questionnaire Answers for Durable Power of Attorney springing (LZ 000510)		A		
133.	Suitcase/Questionnaire Answers for Durable Power of Attorney Effective Now (LZ 000511)		A		
134.	Suitcase/Questionnaire Answers for Living Will Healthcare Power of Attorney Yes to Life Support (LZ 000512)		A		
135.	Suitcase/Questionnaire Answers for AB Living Trust (LZ 000601-610)		A		
136.	Stock certificates (Plaintiffs 00035-39)		A		
137.	Forms for Application for Employer Identification Number (Plaintiffs 00042-48)		A		
138.	Page from LegalZoom.com website (Plaintiffs 0049-50)		A		
139.	Screen prints from LegalZoom.com website regarding Terms of Use (Plaintiffs 00060-71)	Relevance, Rule 403 and Motion in Limine doc 148	B		
140.	Screen prints from LegalZoom.com website regarding Terms of Service for Corporate Center and Subscription Services (Plaintiffs 0072-84)	Relevance, Rule 403 and Motion in Limine doc 148	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
141.	Screen prints from LegalZoom.com website regarding Terms of Service (Plaintiffs 0085-87)	Relevance, Rule 403 and Motion in Limine doc 148	B		
142.	Screen prints from LegalZoom.com website regarding Our Commitment to Privacy (Plaintiffs 0090-94)	Relevance and Motion in Limine doc 148	B		
143.	Screen prints from LegalZoom.com website regarding Deed Transfer, printed March 8, 2011 (P168-180)	Duplicate of Exhibit 17	B		
144.	Screen prints from LegalZoom.com website regarding Last Will and Testament printed March 8, 2011 (P188-210)	Duplicate of Exhibit 15	B		
145.	Letter to John Smallwood from LegalZoom.com and folder of documents received by John Smallwood with Last Will and Testament (P230-266)	Assuming redacted	A		
146.	Screen prints from LegalZoom.com website regarding Trademark Registration printed March 8, 2011 (P267-283)	Duplicate of Exhibit 18	B		
147.	Document regarding Smallwonder Word Mark (P293-295)		A		
148.	Document regarding Sherwood Equities Word Mark (P296)		A		
149.	Document regarding Shorewood Packaging Healthcare Solutions, Springwoods Village, Southwood A St. Joe Hometown, Shapedwood Lighting Designs, Knollwood and Hillwood (P297-303)		A		
150.	Document regarding Redwood Technologies (P304-307)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
151.	Document regarding Crestwood Technology Group and Wood Technology (P308-309)		A		
152.	Screen prints from LegalZoom.com website regarding LLC (Limited Liability Co.) printed March 8, 2011 (P310-334)	Duplicate of Exhibit 16	B		
153.	Exemplar Applications for Employer Identification Number (LZ 000137-139, 155, 167-174)		A		
154.	Legal Document Assistant Bond effective December 18, 2003 (LZ 000175-177)		A		
155.	Copy of Brian Py Liu's Bachelor of Arts degree from University of California (LZ 000194)	Relevance	B		
156.	Page from LegalZoom.com website, About Us, People (LZ 000205-208)	Assuming redacted	A		
157.	Exemplar Registration of Fictitious Name (LZ 000564)		A		
158.	Exemplar Missouri Articles of Incorporation (LZ 000802-803)		A		
159.	Exemplar Missouri Amendment of Articles of Organization (LZ 000804)		A		
160.	Exemplar Missouri Statement of Change of Registered Agent and/or Registered Office by a Foreign or Domestic for Profit or Nonprofit Corporation or a Limited Liability Company (LZ 000805-807)		A		
161.	Exemplar Application by Foreign Limited Liability Company for Authorization to Transact Business in Florida (LZ 000808)		A		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
162.	Exemplar Certificate of Designation of Registered Agent/Registered Office (LZ 000809)		A		
163.	Exemplar Application for Registration of a Limited Liability Partnership (LZ 000810-811)		A		
164.	CD, Missouri Transactions Spreadsheet 03/01/2011-04/30/2011 (LZ 000812)		A		
165.	CD, Missouri Transactions Spreadsheet 05/01/2011-05/20/2011 (LZ 000813)		A		
166.	Missouri Bar CLE Forms Packages Brochure (LZ 000814-831)	Relevance, Rule 403 and Motion in Limine doc 152 & 159	C		
167.	Stipulation with exhibits from <i>In re William R. Thompson, et al.</i> , SC60074 (LZ 000832-900)	Relevance, Rule 403, Motion in Limine doc 154	C		
168.	December 20, 2002 FTC Comments Letter (LZ 000901-0909)	Relevance, Rule 403, Motion in Limine doc 158	C		
169.	May 17, 2007 FTC Letter (LZ 000910-917)	Relevance, Rule 403, Motion in Limine doc 158	C		
170.	Page from LegalZoom.com website, list of downloadable forms, printed 07/21/2011 (LZ 000946-952)	Relevance, Rule 403, Motion in Limine doc 150	C		
171.	LegalZoom.com Sample Real Estate Deed Transfer (LZ 000989-993)	Relevance, Rule 403, Motion in Limine doc 150	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
172.	LegalZoom.com Sample Trademark forms (LZ 001019-1027)	Relevance, Rule 403, Motion in Limine doc 150	C		
173.	LegalZoom.com Sample Copyright forms (LZ 001028-1043)	Relevance, Rule 403, Motion in Limine doc 150	C		
174.	LegalZoom.com Sample Dissolution form (LZ 001044-1046)	Relevance, Rule 403, Motion in Limine doc 150	C		
175.	LegalZoom.com Sample General Partnership Agreement forms (LZ 001047-1068)	Relevance, Rule 403, Motion in Limine doc 150	C		
176.	LegalZoom.com Sample Incorporation forms (LZ 001069-1099)	Relevance, Rule 403, Motion in Limine doc 150	C		
177.	LegalZoom.com Sample Joint Venture Agreement forms (LZ 001100-1115)	Relevance, Rule 403, Motion in Limine doc 150	C		
178.	LegalZoom.com Sample LLP forms (LZ 001116-1122)	Relevance, Rule 403, Motion in Limine doc 150	C		
179.	LegalZoom.com Sample Joint Living Trust forms (LZ 001123-1166)	Relevance, Rule 403, Motion in Limine doc 150	C		
180.	LegalZoom.com Sample Living Will/Healthcare Power of Attorney (LZ 001167-1173)	Relevance, Rule 403, Motion in Limine doc 150	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
181.	LegalZoom.com Sample Name Change forms (LZ 001174-1179)	Relevance, Rule 403, Motion in Limine doc 150	C		
182.	LegalZoom.com Sample Pet Protection Agreement form (LZ 001180-1199)	Relevance, Rule 403, Motion in Limine doc 150	C		
183.	LegalZoom.com Sample Durable Power of Attorney form (LZ 001200-1210)	Relevance, Rule 403, Motion in Limine doc 150	C		
184.	LegalZoom.com Sample Provisional Patent (Self Help) form (LZ 001211-1214)	Relevance, Rule 403, Motion in Limine doc 150	C		
185.	LegalZoom.com Sample Residential Lease Agreement forms (LZ 001215-1230)	Relevance, Rule 403, Motion in Limine doc 150	C		
186.	LegalZoom.com Patent Application Assignment forms and Guidelines (LZ 001231-1251)	Relevance, Rule 403, Motion in Limine doc 150	C		
187.	LegalZoom.com Patent Assignment forms and Guidelines (LZ 001252-1262)	Relevance, Rule 403, Motion in Limine doc 150	C		
188.	LegalZoom.com Secured Promissory Note (Amortized Payments) forms and Guidelines (LZ 001263-1275)	Relevance, Rule 403, Motion in Limine doc 150	C		
189.	LegalZoom.com Release of Credit Information forms and Guide (LZ 001276-1280)	Relevance, Rule 403, Motion in Limine doc 150	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
190.	LegalZoom.com Sublease of Residential Lease (with Landlord Consent) forms and Guide (LZ 001281-1294)	Relevance, Rule 403, Motion in Limine doc 150	C		
191.	LegalZoom.com Termination and Release Agreement form and Guide (LZ 001295-1303)	Relevance, Rule 403, Motion in Limine doc 150	C		
192.	LegalZoom.com Trademark Assignment form and Guide (LZ 001304-1319)	Relevance, Rule 403, Motion in Limine doc 150	C		
193.	LegalZoom.com Trademark License Agreement form and Guide (LZ 001320-1345)	Relevance, Rule 403, Motion in Limine doc 150	C		
194.	LegalZoom.com Equipment Lease Agreement form and Guide (LZ 001346-1367)	Relevance, Rule 403, Motion in Limine doc 150	C		
195.	LegalZoom.com Amendment to Joint Venture Agreement form and Guide (LZ 001368-1376)	Relevance, Rule 403, Motion in Limine doc 150	C		
196.	LegalZoom.com Landlord's Consent to Assignment of Lease form and Guide (LZ 001377-1386)	Relevance, Rule 403, Motion in Limine doc 150	C		
197.	LegalZoom.com Management Services Agreement form and Guide (LZ 001387-1410)	Relevance, Rule 403, Motion in Limine doc 150	C		
198.	LegalZoom.com Mutual Rescission and Release Agreement form and Guide (LZ 001411-1419)	Relevance, Rule 403, Motion in Limine doc 150	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
199.	LegalZoom.com Partnership Dissolution Agreement and Guide (LZ 001420-1431)	Relevance, Rule 403, Motion in Limine doc 150	C		
200.	LegalZoom.com Patent Application Assignment form (LZ 001432-1441)	Relevance, Rule 403, Motion in Limine doc 150	C		
201.	LegalZoom.com Affidavit of Lost Stock Certificate and Guide (LZ 001442-1447)	Relevance, Rule 403, Motion in Limine doc 150	C		
202.	LegalZoom.com Agency Agreement form and Guide (LZ 001448-1463)	Relevance, Rule 403, Motion in Limine doc 150	C		
203.	LegalZoom.com Assignment of Residential Lease form and Guide (LZ 001464-1476)	Relevance, Rule 403, Motion in Limine doc 150	C		
204.	LegalZoom.com Quitclaim Bill of Sale form and Guide (LZ 001477-1482)	Relevance, Rule 403, Motion in Limine doc 150	C		
205.	LegalZoom.com Continuing Guaranty (Unlimited Amount) form and Guide (LZ 001483-1496)	Relevance, Rule 403, Motion in Limine doc 150	C		
206.	LegalZoom.com Copyright License Agreement (Written Work) form and Guide (LZ 001497-1522)	Relevance, Rule 403, Motion in Limine doc 150	C		
207.	Screen prints from Missouri Secretary of State website regarding Forms (LZ 001523-1530)	Relevance, Rule 403, Motion in Limine doc 152	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
208.	Missouri Secretary of State Schedule of Fees and Charges (LZ 001531-1532)	Relevance, Rule 403, Motion in Limine doc 152	C		
209.	Missouri Secretary of State Application for Reservation of Name form (LZ 001533)	Relevance, Rule 403, Motion in Limine doc 152	C		
210.	Missouri Secretary of State Registration of Fictitious Name form (LZ 001534)	Relevance, Rule 403, Motion in Limine doc 152	C		
211.	Missouri Secretary of State Articles of Incorporation Instructions and form (LZ 001535-1538)	Relevance, Rule 403, Motion in Limine doc 152	C		
212.	Missouri Secretary of State Amendment of Articles of Incorporation for a General Business of Close Corporation form (LZ 001539-1540)	Relevance, Rule 403, Motion in Limine doc 152	C		
213.	Missouri Secretary of State Articles of Dissolution by Voluntary Action form (LZ 001541)	Relevance, Rule 403, Motion in Limine doc 152	C		
214.	Missouri Secretary of State Application for Certificate of Authority to do Business in Missouri Instructions and Form (LZ 001542-1548)	Relevance, Rule 403, Motion in Limine doc 152	C		
215.	Missouri Secretary of State Articles of Incorporation of a Nonprofit Corporation instructions and form (LZ 001549-1553)	Relevance, Rule 403, Motion in Limine doc 152	C		
216.	Missouri Secretary of State Articles of Organization instructions and form (LZ 001554-1557)	Relevance, Rule 403, Motion in Limine doc 152	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
217.	Missouri Secretary of State Statement of Resignation of Registered Agent of Limited Liability Company form (LZ 001558)	Relevance, Rule 403, Motion in Limine doc 152	C		
218.	Missouri Secretary of State Certificate of Limited Partnership form (LZ 001559-1560)	Relevance, Rule 403, Motion in Limine doc 152	C		
219.	Missouri Secretary of State Certificate of Cancellation of Registration of Limited Partnership form (LZ 001561)	Relevance, Rule 403, Motion in Limine doc 152	C		
220.	Missouri Secretary of State Application for Registration of a Limited Liability Partnership form (LZ 001562-1563)	Relevance, Rule 403, Motion in Limine doc 152	C		
221.	Missouri Secretary of State Articles of Amendment /Statement of Correction for a Limited Liability Partnership form (LZ 001564-1565)	Relevance, Rule 403, Motion in Limine doc 152	C		
222.	Missouri Secretary of State Notice of Withdrawal for a Limited Liability Partnership form (LZ 001566)	Relevance, Rule 403, Motion in Limine doc 152	C		
223.	Missouri Secretary of State Trademark or Service Mark Application instructions and form (LZ 001567-1569)	Relevance, Rule 403, Motion in Limine doc 152	C		
224.	Missouri Secretary of State Assignment of Mark Registration instructions and form (LZ 001570-1571)	Relevance, Rule 403, Motion in Limine doc 152	C		
225.	Missouri Secretary of State UCC 1 Financing Statement form and instructions (LZ 001572-1573)	Relevance, Rule 403, Motion in Limine doc 152	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
226.	Adams Last Will and Testament forms packet (LZ 001574-1591)	Relevance, Rule 403, Motion in Limine doc 152	C		
227.	Adams Last Will and Testament forms kit with manual (LZ 001592-1665)	Relevance, Rule 403, Motion in Limine doc 152	C		
228.	Adams Living Trust kit with manual and CD (LZ 001666-1679)	Relevance, Rule 403, Motion in Limine doc 152	C		
229.	Adams Living Will and Power of Attorney and Health Care Kit (LZ 001680-1716)	Relevance, Rule 403, Motion in Limine doc 152	C		
230.	Adams General Power of Attorney forms packet (LZ 001717-1734)	Relevance, Rule 403, Motion in Limine doc 152	C		
231.	Adams Quitclaim Deed forms packet (LZ 001735-1746)	Relevance, Rule 403, Motion in Limine doc 152	C		
232.	Adams Warranty Deed forms packet (LZ 001747-1758)	Relevance, Rule 403, Motion in Limine doc 152	C		
233.	Adams Real Estate Legal Forms Kit with Manual (LZ 001759-1841)	Relevance, Rule 403, Motion in Limine doc 152	C		
234.	Adams Residential Lease forms packet (LZ 001842-1874)	Relevance, Rule 403, Motion in Limine doc 152	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
235.	Adams Month-to-Month Rental Agreement forms packet (LZ 001875-1907)	Relevance, Rule 403, Motion in Limine doc 152	C		
236.	Adams Landlording Forms Kit with CD and Manual (LZ 001908-2021)	Relevance, Rule 403, Motion in Limine doc 152	C		
237.	Adams File for Divorce Forms Kit with Manual and CD (LZ 002022-2147)	Relevance, Rule 403, Motion in Limine doc 152	C		
238.	LegalZoom.com Power of Attorney forms packet ordered by B. Powell (LZ 002148-2167)	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		
239.	Sample Operating Agreement prepared by B. Powell (LZ 002168-2197)	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		
240.	Sample Last Will and Testament prepared by B. Powell (LZ 002198-2207)	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		
241.	Sample Will prepared by B. Powell (LZ 02208-2211)	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
242.	Sample Corporate Bylaws prepared by B. Powell 2215)	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		
243.	Sample LLC Operating Agreement for Single-Member LLC, prepared by B. Powell (LZ 002216-2217)	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		
244.	Screen prints from Quicken Legal Business Pro 2011 (LZ 002218-2234)	Relevance, Rule 403, Motion in Limine doc 152	C		
245.	Screen prints from Quicken WillMaker Plus 2011 (LZ 002235-2261)	Relevance, Rule 403, Motion in Limine doc 152	C		
246.	Book, Every Man His Own Lawyer (LZ 002262-2668)	Relevance, Rule 403, Motion in Limine doc 152	C		
247.	Book, How to Avoid Probate (LZ 002669-2979)	Relevance, Rule 403, Motion in Limine doc 152	C		
248.	Expert Report of Burnele V. Powell	Relevance, Rule 403, Motion to Exclude Testimony of Powell	B		
249.	Software, Quicken WillMaker Plus 2011 (Exhibit H-2 to Defendant's Suggestions in Support of Motion for Summary Judgment)	Relevance, Rule 403, Motion in Limine doc 152	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
250.	Software, Quicken Legal Business Pro 2011 (Exhibit H-3 to Defendant's Suggestions in Support of Motion for Summary Judgment)	Relevance, Rule 403, Motion in Limine doc 152	C		
251.	UDEED Sample Missouri Quitclaim Deed for LegalZoom	Relevance, Rule 403, Motion in Limine doc 152	C		
252.	UDEED Sample Missouri Warranty Deed for LegalZoom	Relevance, Rule 403, Motion in Limine doc 152	C		
253.	Plaintiffs' Initial Disclosures under Rule 26(a)(1)	Relevance	B		
254.	Plaintiffs' Supplemental Disclosures under Rule 26(a)(1)	Relevance	B		
255.	Plaintiffs' Responses and Objections to Defendant LegalZoom.com, Inc.'s First Request for Production of Documents	Relevance	B		
256.	Defendant's Initial Rule 26(a)(1)(A) Disclosures	Relevance	B		
257.	Defendant's First Supplemental Rule 26(a)(1)(A) Disclosures	Relevance and Motion in Limine doc 160	B		
258.	Defendant's Second Supplemental Rule 26(a)(1)(A) Disclosures	See Motion in Limine doc 150 & 160	B		
259.	Defendant's Answers to Plaintiffs' First Set of Interrogatories to Defendant	Hearsay & Relevance	B		
260.	Defendant's Answers to Plaintiffs' Second Interrogatories Directed to Defendant	Hearsay & Relevance	B		
261.	Defendant's Answers to Plaintiffs' Third Set of Interrogatories to Defendant	Hearsay & Relevance	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
262.	Defendant's Answers to Plaintiffs' First Set of Requests for Production to Defendant	Hearsay & Relevance	B		
263.	Defendant's Answers to Plaintiffs' Second Request for Production of Documents to Defendant	Hearsay & Relevance	B		
264.	Defendant's Answers to Plaintiffs' Third Request for Production of Documents to Defendant	Hearsay & Relevance	B		
265.	Deposition of Gerald T. Ardrey	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
266.	Deposition of Chad M. Ferrell	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
267.	Deposition of Edward Hartman 08/03/2010	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
268.	Deposition of Edward Hartman 02/16/2011	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
269.	Deposition of Nelly Jacobo	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
270.	Deposition of Todd Janson	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
271.	Deposition of Brian Liu	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
272.	Deposition of Jennifer Loo	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
273.	Deposition of Burnele V. Powell	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
274.	Deposition of John Smallwood	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
275.	Deposition of Adam Thomas	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
276.	Deposition of Jake Varghese	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
277.	Deposition of Richard F. Waigand	Depositions are not exhibits and are not properly on this list. Deposition designations are already complete by order of this Court.	B		
278.	Summary of Missouri transactions for damages	Plaintiffs do not know which exhibit is referred to by this designation.	C		
279.	All exhibits identified by Plaintiffs	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
280.	All documents produced by Plaintiffs	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	B		
281.	All documents produced by Defendant	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	B		
282.	All pleadings, filings and correspondence	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	B		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
283.	All exhibits to pleadings and motions	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	B		
284.	All exhibits to depositions	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	C		
285.	All demonstrative exhibits	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	C		

	Defendant's Exhibits	Objections	Category A, B, C	Offered	Admit/Not Admitted (A)-(NA)
286.	All exhibits necessary for rebuttal	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object since it is plainly overbroad.	C		
287.	Document Demonstration of LegalZoom website <i>via</i> internet	This description is not proper as it does not apprise the Plaintiffs of what document Defendant is referring to. As such, Plaintiffs object.	C		

[Note: Any exhibits not properly listed in the Memo on Pretrial Conference will be subject to exclusion at trial and any objection not indicated will be deemed waived unless this memo is modified prior to trial to prevent manifest injustice. All exhibits shall be made available to opposing counsel for inspection sufficiently prior to the Pretrial Conference to permit objections to be noted in the memo. Failure to provide exhibits for inspection shall constitute a valid ground for objection at trial and should be noted in the memo.]

1 In the event the parties are unable to reproduce an exhibit list in conformity with the proposed exhibit list set forth above, they may seek permission from the court to utilize an alternate exhibit list or they may obtain an exhibit list in the form set forth in this memo from the clerk's office.

2 A: The parties agree that these exhibits shall be considered to be already in evidence at the trial without further offer, proof, or objection. Specifically, the parties agree that both plaintiff(s) and defendant(s) exhibits listed in this column are in evidence at the commencement of the trial and available for use by any party at any stage of the trial.

B: Parties want to introduce into evidence these exhibits to which all foundation, identification and

authenticity objections are waived but not to which an opposing party objects on the grounds noted. It is further agreed that any exhibit listed in this column may be used by any other party provided that party establishes that the exhibit is otherwise admissible.

C: Parties want to introduce into evidence these exhibits to which an opposing party will object on the grounds noted. It is further agreed that any exhibit listed in this column may be used by any other party provided that party establishes the exhibit is otherwise admissible.

III. WITNESS LIST:

A. Plaintiff(s) witnesses (list witnesses and addresses):

1. Todd Janson
299 Romaine Spring View
Fenton, Missouri
2. John Smallwood
1600 Southwest Blvd
Jefferson City, Missouri 65109
3. Richard Waigand
1610 Des Peres, Suite 300
St. Louis, Missouri 63131
4. Jennifer Loo (by deposition)
5. Adam Thomas (by deposition)
6. Brian P.Y. Liu (by deposition)
7. Jake Varghese (by deposition)
8. Nelly Jacobo (by deposition)
9. Edward Hartman (by deposition)

B. Defendant(s) witnesses (list witnesses and addresses):

1. Edward Hartman
c/o LegalZoom.com, Inc.
101 North Brand Boulevard
11th Floor
Glendale, CA 91203
2. Brian Liu
c/o LegalZoom.com, Inc.
101 North Brand Boulevard
11th Floor
Glendale, CA 91203
3. Burnele V. Powell
615 Lyngate Court
Lexington, South Carolina 29072

4. Jeff Pupillo
301 Sovereign Ct STE 104
Manchester, MO 63011
5. Robert Collins
200 Orchard Court
Columbia, MO 65203
6. Denise Fattic
29 Barrington Drive
Saint Peters, MO 63376
7. Thomas Throneberry
709 Brentwood Ln.
Holts Summit, MO 65043
8. Jake Varghese (by deposition)
c/o LegalZoom.com, Inc.
101 North Brand Boulevard
11th Floor
Glendale, CA 91203
9. Adam Thomas (by deposition)
c/o LegalZoom.com, Inc.
101 North Brand Boulevard
11th Floor
Glendale, CA 91203
- 10 Nelly Jacobo (by deposition)
c/o LegalZoom.com, Inc.
101 North Brand Boulevard
11th Floor
Glendale, CA 91203
11. Jennifer Loo
c/o LegalZoom.com, Inc.
101 North Brand Boulevard
11th Floor
Glendale, CA 91203
12. Todd Janson (in person and by deposition)
13. Chad Ferrell (in person and by deposition)

14. Gerald T. Ardrey (in person and by deposition)

15. John Smallwood (in person and by deposition)
1109 Meadows Place
Jefferson City, MO 65101

C. A party listing a witness guarantees his/her presence at trial unless the court and opposing counsel are notified to the contrary at least seven (7) days prior to trial. All parties are free to call any witness listed by the opposing party whether they have listed them or not.

D. A witness testifying by deposition must be listed with a designation that the testimony will be by deposition.

E. FACTUAL ISSUES:

A. Plaintiff(s) Factual Issues:

1. Is LegalZoom drawing or assisting in the drawing of legal documents for class members?
2. How much did class members pay Legalzoom for legal documents?
3. Does LegalZoom continue to draw or assist in the drawing of legal documents for Missouri residents?

B. Defendant(s) Factual Issues:

1. Whether LegalZoom “prepares” customers’ documents or whether customers prepare their own documents themselves using the LegalZoom website and software.
2. Whether LegalZoom assists in the drawing or procuring of legal documents.
3. Whether “scrivening” or filling in blanks in a blank legal form with information provided by another person is assisting in the drawing or procuring of legal documents.

4. Whether causing software to auto-populate or fill in blanks in a blank legal form with information provided by another person is assisting in the drawing or procuring of legal documents.
5. Whether proofreading data files and other documents for consistency, spelling, grammar, and formatting constitutes the preparation of legal documents.
6. Whether class representatives had any interaction with a person while using the LegalZoom website.
7. Whether class representatives received personal advice as to legal remedies or consequences while using the LegalZoom website.
8. Whether class representatives believed they were receiving legal counsel, advice, or recommendation.

F. LEGAL ISSUES:

A. Plaintiff(s) Legal Issues:

1. Has Legalzoom.com violated Missouri statute § 484.020 RSMo. & § 407.010 et.seq. by engaging the law business?
2. Are the plaintiffs entitled to recover amounts paid to Legalzoom, including prejudgment interest, under the theory of money had and received, for the time period from December 17, 2004 to December 17, 2007?
3. Are plaintiffs entitled to injunctive relief enjoining LegalZoom from continuing to violate § 484.020 RSMo.?

B. Defendant(s) Legal Issues:

1. Whether class representatives' lack of interaction with a person at LegalZoom binds the other members of the class.
2. Whether the "duty to strike a workable balance between the public's protection and the public's convenience" requires consideration of whether LegalZoom provided any individual legal counseling, advice, or recommendations to class representatives. *In re First Escrow*, 840

S.W.2d 839, 846 (Mo. banc 1992), citing *Hulse v. Criger*, 247 S.W. 2d 855 (Mo. 1952).

3. Whether drafting a blank legal document constitutes the practice of law or the unauthorized practice of law under Missouri law.
4. Whether “scrivening” or filling in blanks in a blank legal form with information provided by another person constitutes the practice of law or the unauthorized practice of law under Missouri law.
5. Whether causing software to auto-populate or fill in blanks in a blank legal form with information provided by another person constitutes the practice of law or the unauthorized practice of law under Missouri law.
6. Whether creating software that fills in blanks in blank legal forms with information provided by another person constitutes the practice of law or the unauthorized practice of law under Missouri law.
7. Whether proofreading of data files and other documents for consistency, spelling, grammar, and formatting constitutes the practice of law or the unauthorized practice of law under Missouri law.
8. Whether fees paid for registered agent services, living will alert wallet cards, corporate minutes, or corporate kits are properly included in damages in the case.
9. Whether fees paid for patent and trademark search and monitoring services are properly included in damages in the case.
10. Whether claims made on a theory of money had and received are subject to prejudgment interest accruing from before the filing of the petition when no demand was made prior to the filing of the petition.
11. If the Court or jury concludes that LegalZoom’s actions are the unauthorized practice of law, what limited modifications are necessary to narrowly tailor an injunction to comply with § 407.010 RSMo.

[Note: Each party should set forth all theories of recovery or defense, including specifications of fault which will be raised at trial. The elements of each theory of recovery and the elements of damages sought must be included.

The parties should also set forth any legal questions which are likely to arise at trial. This should include such things as:

A legal dispute as to the elements of plaintiff’s cause or whether recovery is barred as a matter of law by a

particular defense;

Whether, as a matter of law, a particular defense would apply;

Any legal dispute as to the measure, elements, or recovery of damage claimed by plaintiff; and

Whether the Statute of Frauds or the Parole Evidence Rule will be raised; etc.]

VI. UNUSUAL EVIDENTIARY QUESTIONS:

Plaintiff(s) Unusual Evidentiary Questions:

1. Plaintiffs are not aware of any unusual evidentiary questions that are expected to arise in this trial apart from those that have already been addressed in Motions in Limine filed by the plaintiffs.

Defendant(s) Unusual Evidentiary Questions:

1. LegalZoom is not aware of any unusual evidentiary questions expected to arise at trial apart from those already identified in LegalZoom's Motions in Limine.

Note: Identification of unusual evidentiary questions should also include citations to relevant legal authorities.

/s/Timothy Van Ronzelen

Timothy Van Ronzelen, #44382

Matthew A. Clement, #43833

Kari A. Schulte, #57739

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ATTORNEYS FOR DEFENDANT LEGALZOOM.COM, INC.

° = offered & admitted w/o objection Ex = offered, but not objected to and excluded DB = admitted, de bene	Ltd = admitted for limited purposes X = offered and admitted over objection NO = marked, but not offered WD = offered, then withdrawn
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Defendant(s) Exhibits	Objections	Category A, B, C	Offered	Action Taken
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Plaintiff(s) Exhibits	Objections	Category A, B, C	Offered	Action Taken
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