

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

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

**DEFENDANT LEGALZOOM.COM, INC.’S OBJECTIONS TO  
PLAINTIFFS’ COUNTER DESIGNATIONS OF DEPOSITION TESTIMONY**

Defendant LegalZoom.com, Inc. (“LegalZoom”) hereby asserts its objections to the Plaintiffs’ counter designation of deposition testimony.

<b>Deposition of Gerald T. Adrey</b>		
<b>Plaintiffs’ Designations</b>	<b>LegalZoom’s Objections</b>	<b>LegalZoom’s Counter-Designations</b>
5:8-10		
7:25-8:12		
9:3-20		
13:7-18		
13:24-14:4		
29:11-29:23		
32:21-34:12		
36:14-37:4		
39:13-40:5		
41:14-41:15		
44:3-44:16	Relevance, legal conclusion	
47:7-49:21		
56:3-56:17		

57:14-58:11		
63:12-65:4		

<b>Deposition of Chad M. Ferrell</b>		
<b>Plaintiffs' Designations</b>	<b>LegalZoom's Objections</b>	<b>LegalZoom's Counter-Designations</b>
5:15-18		
6:1-7:11		
8:12-8:20		
9:18-22		
16:7-16:18	Legal conclusion	
20:10-20:23		
26:25-27:11		
28:2-28:10		
28:11-13		
29:1-30:12		
34:8-34:10		
36:25-37:10		
39:7-39:22		
41:10-22		
42:1-43:22		

<b>Deposition of John Smallwood</b>		
<b>Plaintiffs' Designations</b>	<b>LegalZoom's Objections</b>	<b>LegalZoom's Counter-Designations</b>
15:17-16:22	Relevance (all), hearsay (16:18-22)	
18:21-19:8	Relevance	
107:18-108:6		

For the foregoing reasons, Defendant LegalZoom.com, Inc. requests the Plaintiffs' counter designations be stricken in part.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2011, I electronically filed the above and foregoing with the clerk of court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

s/ James T. Wicks