

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

TODD JANSON, GERALD T.	)
ARDREY, CHAD M. FERRELL, and	)
C & J REMODELING, LLC, on	)
behalf of themselves and on	)
behalf of all others	)
similarly situated,	)Case No.
Plaintiffs,	) 2:10-cv-04018-NKL
	)
vs.	)
	)
LEGALZOOM.COM, INC.,	)
Defendant.	)

VIDEOTAPED DEPOSITION OF TODD JANSON  
Taken on behalf of Defendant  
July 29, 2010

Jennifer L. Herbeck, RPR, CSR, CCR  
Registered Professional Reporter  
Illinois CSR License No. 084-004271  
Missouri CCR License No. 733

**EXHIBIT 1**

Examination by Mr. Thompson

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1 something and picked something off of there, but  
2 anybody could have wrote that.  
3 The reason I went to LegalZoom is I  
4 thought that a lawyer would be creating this will  
5 for me.  
6 Q. Let me ask you my question again, and I'd  
7 like you to answer the question. You can answer  
8 your lawyer's questions when he asks you questions.  
9 A. Okay.  
10 Q. When you buy a form at an office supply  
11 store, for example, you hope and believe that that  
12 was drafted by a lawyer?  
13 MR. VAN RONZELEN: I'm just going to  
14 object that's been asked and answered several times  
15 now, but go ahead.  
16 Q. (By Mr. Thompson) Correct?  
17 A. I would hope, but I do not know.  
18 Q. And when you went to LegalZoom to get a  
19 will document prepared, you believed that that  
20 document was at some point created by a lawyer also.  
21 Correct?  
22 A. I believe that somebody would have taken  
23 my information and being a lawyer and created my  
24 document, yes.  
25 Q. What -- upon what do you base that belief?

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1 A. From LegalZoom saying that they're -- they  
2 have several lawyers on staff, they have -- they can  
3 provide you legal advice, they can provide you legal  
4 documents. That's usually what attorneys do, so  
5 that's what I assumed.  
6 Q. Well, you had not -- you don't recall any  
7 contents of any ad you heard prior to using the  
8 service. Right?  
9 A. Not by word, no.  
10 Q. And so do you recall any specific time  
11 ever you heard from LegalZoom that the form that you  
12 received would be written by you -- by a lawyer for  
13 you?  
14 A. Specifically, no.  
15 Q. Do you recall specifically seeing several  
16 times through the web page that LegalZoom disclaimed  
17 providing legal services?  
18 A. I don't recall doing that, no.  
19 Q. You don't recall that at all?  
20 A. No.  
21 Q. But you do recall going through all the  
22 web pages in connection with the preparation and  
23 paying for your will. Right?  
24 A. Correct.  
25 Q. Have you seen anywhere in writing where

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1 LegalZoom represented to you or caused you to  
2 believe that -- well, actually, said that your will  
3 would be prepared by an attorney?  
4 A. Have I seen it, no, not that I recall.  
5 Q. And you never spoke -- you didn't speak to  
6 an attorney. You didn't ever speak to anyone at  
7 LegalZoom. Right?  
8 A. No.  
9 Q. What is your perception -- what is your  
10 understanding of what it means to have an  
11 attorney-client relationship?  
12 A. That things that I discuss with my  
13 attorney is privileged.  
14 Q. Anything else?  
15 A. No.  
16 Q. Do you think it's an important  
17 relationship?  
18 A. Yes.  
19 Q. Kind of a special relationship?  
20 MR. VAN RONZELEN: I object as to vague  
21 and ambiguous. You can answer.  
22 A. I guess so.  
23 Q. (By Mr. Thompson) Any perception as to  
24 whether or not it can be an expensive proposition to  
25 hire a lawyer?

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1 A. Yes.  
2 Q. What's your view of that?  
3 A. You know, I don't have a view. People  
4 charge for what -- you know, what the market is, I  
5 guess.  
6 Q. Do you -- for instance, do you -- in your  
7 current relationship with your lawyers, do you have  
8 a written fee arrangement?  
9 A. I believe they're advancing me right  
10 now --  
11 Q. I don't want to know --  
12 A. Right.  
13 Q. I don't want to know the nature, but do  
14 you have a written agreement by which they are  
15 providing you services as lawyers? That's kind of a  
16 complicated way --  
17 A. Yeah.  
18 Q. Did you sign anything with -- did you  
19 receive anything in writing from your lawyers about  
20 them becoming your lawyers?  
21 A. I believe so, yes.  
22 Q. Did you receive anything like that from  
23 LegalZoom?  
24 A. Not to my knowledge. I don't know.  
25 Q. Did you ever get a name of a lawyer at