

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

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,

Plaintiffs,

v.

LEGALZOOM.COM, INC.,

Defendant.

Case No. 2:10-cv-04018-NKL

DECLARATION OF THOMAS THRONEBERRY

I, Thomas Throneberry, declare and state as follows:

1. I am over 21 years of age. If called upon to do so, I am competent to and would testify to the matters set forth herein, of which I have personal knowledge.

2. I am currently retired; I previously was employed at the United States Department of Commerce in Kansas City, Mo.

3. In February of 2009 I went to the LegalZoom.com website because I wished to prepare two wills, one for myself and one for my wife, Merry.

4. I chose to go to LegalZoom.com because I wanted to draw up my own will myself. If my situation were more complicated, I would have hired an attorney. But specifically because I did not believe my needs were complicated, I did not want to hire an attorney or pay attorneys' fees.

5. I expected LegalZoom to provide me with a template to type in my information, and that when I was finished, my printed will would be mailed to me, with my information printed directly in the blanks.

6. That is exactly what happened. LegalZoom provided me with a framework. The website prompted me with questions, such as my name, address, the name of my spouse, the name of who I wanted to serve as my personal representative, and how I wanted my estate to be divided. I typed answers in as each question appeared.

7. Later, a printed version of my will arrived in the mail. The blanks were filled in with printed information that precisely matched what I typed into the blanks on the website. There were no changes in the printed version of my will compared to what I typed into the blanks on the website.

8. I did not expect an attorney to prepare or review my will. I did not expect to receive any legal advice and I did not receive any legal advice.

9. I believed I was representing myself and that I was drafting my own will.

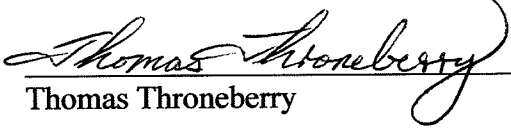
10. I did not expect LegalZoom to prepare my will. I did not rely on LegalZoom to prepare my will. I prepared my own will by filling out an online questionnaire — typing information into the blanks in response to the questionnaire on the website.

11. All LegalZoom did was print and mail my will to me.

12. I recall hearing disclaimers on the radio indicating that LegalZoom.com is not a law firm and cannot offer legal advice.

13. I did not have any interaction with any LegalZoom employee.

Pursuant to 28 U.S.C. section 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on August 3, 2011.


Thomas Throneberry