

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

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

**JOINT PROPOSED SCHEDULING ORDER/DISCOVERY
PLAN**

In accordance with the Court’s orders of February 11, 2010 (Docket Nos. 12 and 13), the parties submit their joint proposed scheduling order/discovery plan.

1. L.R. 16.1(f)1 – Date for Limiting Joinder of Parties: December 1, 2010.
2. L.R. 16.1(f)2 – Date for Limiting the Filing of Motions to Amend Pleading: December 1, 2010.
3. L.R. 16.1(f)3(a) – Date for Limiting the Filing of Discovery Motions: April 29, 2011.
4. L.R. 16.1(f)3(b) – Date for Limiting the Filing of Dispositive Motions: May 31, 2011. In addition,
 - a. Plaintiffs will file a Motion for Class Certification by October 29, 2010.
 - b. Defendants will file an Opposition to the Motion for Class Certification by November 29, 2010.

- c. Plaintiffs will file a Reply on the Motion for Class Certification by December 13, 2010.
5. L.R. 16.1(f)4 – Discovery Plan for Completion of All Discovery:
- a. L.R. 26.1(c)(1) – Dates by Which Discovery Will Be Completed.
 - i. Date by Which Factual Discovery Will Be Completed: April 29, 2011.
 - ii. Date by Which Discovery of Plaintiffs’ Expert Witnesses Will Be Completed: May 30, 2011, with disclosure as to those witnesses due April 29, 2011.
 - iii. Date by Which Discovery of Defendant’s Expert Witnesses Will Be Completed: June 30, 2011, with disclosure as to those witnesses due May 30, 2011.
 - b. L.R. 26.1(c)(2) – Subjects on Which Discovery May Be Needed: In accordance with Rule 26(b)(1) of the Federal Rules of Civil Procedure, the parties may obtain discovery regarding any nonprivileged matter that is relevant to any party’s claim or defense. Plaintiffs anticipate that they will seek discovery regarding the nature of services offered by Defendant to Plaintiffs and the putative class members, the quantity of these services, amounts charged for these services, and the identities of the putative class members. Defendants anticipate that they will seek discovery regarding Plaintiffs’ background, use of Defendant’s services, claims, and alleged damages, the composition of the proposed class, and the facts and circumstances giving rise to Defendants’ affirmative defenses.

- c. L.R. 26.1(c)(3) – The parties conducted their Rule 26 meeting on February 25, 2010, and agreed that Initial Disclosures Will Be Made on or before April 15, 2010. Discovery will not commence until after Initial Disclosures have taken place unless discovery limited to Defendant’s Motion to Dismiss for Improper Venue is deemed necessary.
 - d. L.R. 26.1(c)(4) – Additional Limitations on Discovery: None.
 - e. L.R. 26.1(c)(5) – Other Orders That Should Be Entered by the Court:
None.
- 6. L.R. 16.1(f)5 – Estimated Number of Days to Try Action: 5.
 - 7. L.R. 16.1(f)6 – Trial Date: On or after October 3, 2011.
 - 8. L.R. 16.1(f)7 – Protective Order: Plaintiffs do not anticipate requesting a protective order. Defendant will request the entry of a protective order before production of documents.

Respectfully submitted,

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