

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

**DEFENDANT'S RULE 26(A)(1)(A) INITIAL DISCLOSURES**

Defendant LegalZoom.com, Inc. ("LegalZoom") provides the following Initial Disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure.

1. LegalZoom is currently aware of the following individuals likely to have discoverable information that LegalZoom may use to support its claims or defenses, unless solely for impeachment:

- a. Brian Liu, Co-Founder and Chairman of LegalZoom. Historical information regarding LegalZoom.
- b. Scott MacDonnell, Vice President, Consumer Marketing for LegalZoom. Information regarding LegalZoom's marketing of its online document preparation services for consumers.
- c. Tim Bint, Vice President of Finance and Controller. Information regarding LegalZoom's customer accounts, including fees paid by LegalZoom customers in Missouri for online document preparation services.

d. Frank Monestere, President and Chief Operating Officer for LegalZoom. Information regarding LegalZoom's operations of its online document preparation services for consumers.

e. Eddie Hartman, Chief Strategy Officer for LegalZoom. Information regarding LegalZoom's technology related to automatic document creation, operations, customer accounts, and marketing.

f. Adam Thomas, Vice President and General Manager of Intellectual Property for LegalZoom. Information regarding LegalZoom's intellectual property online document preparation services.

g. Jake Varghese, Vice President and General Manager of Business Services for LegalZoom. Information regarding LegalZoom's business services online document preparation services.

h. Nelly Jacobo, Vice President and General Manager of Personal Services for LegalZoom. Information regarding LegalZoom's personal services online document preparation services.

i. Present and former officers, employees, and agents of LegalZoom. Information regarding LegalZoom's operations, customer accounts with Missouri residents, and marketing.

j. Plaintiffs and all persons identified in Plaintiffs' Rule 26(a)(1)(A) Initial Disclosures.

2. LegalZoom is currently aware of the following documents, electronically stored information, and tangible things that it has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

a. Certain documents in the possession of LegalZoom employees related to LegalZoom marketing.

b. Certain documents in the possession of LegalZoom employees related to LegalZoom's web site.

c. Certain documents in the possession of LegalZoom employees related to LegalZoom's various terms and conditions.

d. Certain documents in the possession of LegalZoom employees related to automatic document creation technology.

3. LegalZoom is currently not seeking any damages.

4. LegalZoom is currently aware of the following insurance agreement under which LegalZoom is liable to satisfy all or part of a judgment in the action:

a. None.

LegalZoom reserves the right to supplement its disclosures if and when new information comes to its attention or possession.

Dated: April 15, 2010

Respectfully submitted,

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*Attorneys for LegalZoom.com, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2010, the foregoing was electronically filed with the Clerk of Court and served by operation of the Court's electronic filing system upon all counsel of record.

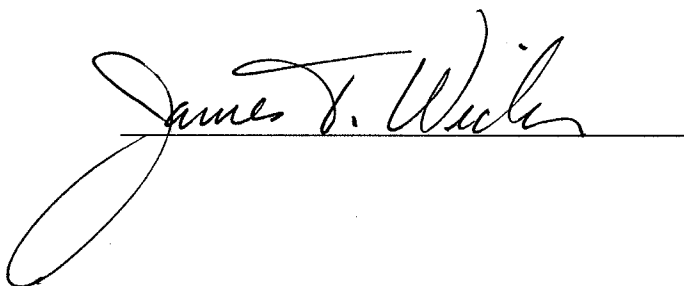
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A handwritten signature in black ink, appearing to read "James J. Simeri", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.