

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.	)	

**PLAINTIFFS’ SUPPLEMENTAL DISCLOSURES**  
**PURSUANT TO RULE 26(a)(1)**

Plaintiffs make the following supplemental initial disclosures as required by Rule

26(a)(1)(A)(i) – (iv) of the Federal Rules of Civil Procedure:

I. The name and, if known, the address and telephone number of each person individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

**Disclosure:** Each named Plaintiff has knowledge regarding the allegations in their amended class-action petition. Plaintiffs may be contacted through counsel.

Michele Lawson. Her last known address is 120 Marble Ct., Troy, MO 63379. Michele Lawson assisted Plaintiff Gerald Ardrey in using Defendant’s website.

John Smallwood, Smallwood Technologies, 1600 Southwest Blvd, Jefferson City, Missouri 65109. Mr. Smallwood has knowledge of the Legalzoom website.

Any persons identified at any time by Defendant in its Rule 26 Disclosures.

**EXHIBIT 5**

II. A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

**Disclosure:** Some of Plaintiffs have copies of the documents that Defendant prepared for them. These documents include estate-planning documents, and documents related to entity formation. Plaintiffs may have receipts that evidence their transactions with Defendant. Copies of these documents have previously been provided to Defendant’s counsel.

Plaintiffs may also use any documents or things produced by Defendant in discovery in this case.

Mr. Smallwood also has copies of screen shots and other information from Legalzoom’s website which will be produced to defendant’s counsel.

III. A computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

Plaintiffs, individually, and on behalf of the putative class, claim all damages authorized under the § 484.020.2 RSMo., including actual damages in the sum of the fees that Defendant charged Plaintiffs and each member of the Plaintiffs’ Class, and treble damages in the sum of three times these fees. Plaintiffs, individually, and on behalf of the putative class, claim all damages authorized under § 427.025 RSMo., including actual damages in the sum of the fees that Defendant charged Plaintiffs and each member of the Plaintiffs’ Class, attorney fees, and punitive damages. The named Plaintiffs also seek appropriate compensation for having performed the duties of class representative.

Plaintiffs believe that Defendant has in its possession the records necessary to substantiate Plaintiffs' claims and assist in calculating damages. Absent these records, Plaintiffs are unable to provide a computation of damages. Defendant has agreed it will provide damage information through at least March 1, 2011 and plaintiff will provide a more specific calculation after that information is received.

IV. For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action and to indemnify or reimburse for payments made to satisfy the judgment.

Disclosure: None.

David T. Butsch, #37539  
James J. Simeri, #52506  
231 S. Bemiston Ave., Ste. 260  
Clayton, MO 63105  
314.863.5700, 314.863.5711 (fax)  
[butsch@bsflawfirm.com](mailto:butsch@bsflawfirm.com)  
[simeri@bsflawfirm.com](mailto:simeri@bsflawfirm.com)

Randall O. Barnes, #39884  
**RANDALL O. BARNES & ASSOCIATES**  
219 East Dunklin Street, Suite A  
Jefferson City, Missouri 65101  
573.634.8884, 573.635.6291 (fax)  
rbarnesjclaw@aol.com

Edward D. Robertson, Jr., # 27183  
Mary Doerhoff Winter, # 38328  
**BARTIMUS, FRICKLETON,  
ROBERTSON & GORNY**  
715 Swifts Highway  
Jefferson City, MO 65109  
573.659.4454, 573.659.4460 (fax)  
chiprob@earthlink.net  
marywinter@earthlink.net

/s/ Timothy Van Ronzelen

Timothy Van Ronzelen, #44382  
Matthew A. Clement, #43833  
Kari A. Schulte, #57739  
**COOK, VETTER, DOERHOFF &  
LANDWEHR, PC**  
231 Madison  
Jefferson City, Missouri 65101  
573.635.7977, 573.635.7414 (fax)  
tvanronzelen@cndl.net  
mclement@cndl.net  
kschulte@cndl.net

Steven E. Dyer, #45397  
**LAW OFFICES OF STEVEN DYER**  
10850 Sunset Office Drive, Ste. 300  
St. Louis, MO 63127  
314.898.6715  
jdcpamba@gmail.com

**Attorneys for Plaintiffs**

**CERTIFICATE OF SERVICE**

I certify that on March 1, 2011, served this paper by e-mail as follows:

<b>Party</b>	<b>Counsel</b>
Defendant LegalZoom.com, Inc.	Robert M. Thompson James T. Wicks BRYAN CAVE LLP One Kansas City Place 1200 Main Street, Ste. 3500 Kansas City, MO 64105 816.374.3200, 816.374.3300 (fax)

/s/Timothy Van Ronzelen