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

TODD JANSON, et al.,	)
Plaintiffs,	)
v.	) Case No. 10-04018-CV-C-NKI
LEGALZOOM.COM, INC.	)
D-f14	)
Defendant.	)

## PLAINTIFFS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND IN OPPOSITION TO MOTION TO DISMISS FOR IMPROPER VENUE

Plaintiffs move for an additional 10 days, up to and including March 25, 2010, to respond in opposition to Defendant's motion to dismiss for improper venue (Docket No. 17). Defendant's counsel has authorized Plaintiffs' counsel to represent to the court that Defendant does not oppose this motion. In support of this motion, Plaintiffs state:

- Defendant filed its motion to dismiss for improper venue on February 26, 2010.
   Thus, Plaintiffs' response is presently due on March 15, 2010.
- If the Court grants this motion, Plaintiffs' response would be due on March 25,
   2010.
- 3. Plaintiffs request this extension of time due to the workload of Plaintiffs' counsel. This request is not intended to delay proceedings, or for other improper purposes.

Therefore, Plaintiffs request that the Court enter an order authorizing them to file their response in opposition no later than March 25, 2010, and provide such other relief as is just.

#### Respectfully submitted,

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

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

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@cvdl.net
mclement@cvdl.net
kschulte@cvdl.net

#### /s/ James J. Simeri

David T. Butsch, # 37539 James J. Simeri, #52506 **BUTSCH SIMERI FIELDS LLC** 231 S. Bemiston Ave., Ste. 260 Clayton, MO 63105 314.863.5700, 314.863.5711 (fax) butsch@bsflawfirm.com simeri@bsflawfirm.com

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 10, 2010, I filed the foregoing with the Clerk of the Court using the CM/ECF system. The system sent notification of this filing to the following:

Party	Counsel
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)  John Michael Clear Michael Biggers James Wyrsch BRYAN CAVE LLP One Metropolitan Square – Ste. 3600 211 N. Broadway St. Louis, MO 63102 314.250.2000, 314.259.2020 (fax)