

**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 ROBERT M. THOMPSON IN SUPPORT OF
MOTION TO RECONSIDER OR, IN THE ALTERNATIVE, TO TRANSFER VENUE**

I, Robert M. Thompson, declare and state as follows:

1. I am a member of the law firm of Bryan Cave LLP, counsel of record for Defendant LegalZoom.com, Inc. (“LegalZoom”) in the above-captioned matter. I submit this Declaration in support of LegalZoom’s Motion to Reconsider or, In the Alternative, to Transfer Venue, filed with this Court on June 16, 2010.

2. Attached hereto as Exhibit A is a true and correct copy of Defendant LegalZoom’s Rule 26(a)(1)(A) Initial Disclosures, served on Plaintiffs on April 15, 2010.

3. Attached hereto as Exhibit B is a true and correct copy of Plaintiffs’ Initial Disclosures Under Rule 26(a)(1), served on LegalZoom on April 15, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 16, 2010

s/ Robert M. Thompson _____

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
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Plaintiffs,

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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,

BRYAN CAVE LLP

By: 

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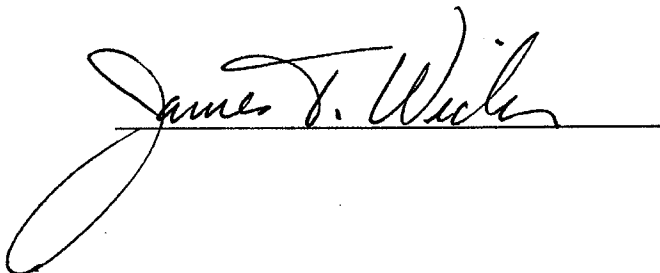
A handwritten signature in black ink, appearing to read "James J. Simeri", is written over a horizontal line. The signature is fluid and cursive, with a large loop at the end.

Exhibit B

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' INITIAL DISCLOSURES UNDER RULE
26(a)(1)

Plaintiffs make the following 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. Plaintiffs identify

REDACTED, Her last known address is **REDACTED**

assisted Plaintiff Gerald Ardrey in using Defendant’s website. In addition, representatives of Defendant are also likely to have information related to the allegations in the amended class action petition.

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. Copies of these documents are attached. Plaintiffs may have receipts that evidence their transactions with Defendant, which may include credit card statements. Any such documents will be produced in redacted form to prevent disclosure of private account information.

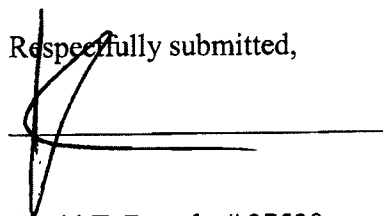
- iii. a computation of each category of damages claimed by the disclosing party – who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials 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 § 407.025 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 and calculate Plaintiffs’ claims. Absent these records, Plaintiffs are unable to provide a computation of damages.

- 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.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I certify that on April 15, 2010, I served this paper by mail as follows:

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