

**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.)	

NOTICE OF DEPOSITION

In accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, the undersigned attorney will take the deposition of a representative of LegalZoom.com, Inc., to be taken upon oral examination before a shorthand reporter and notary public duly authorized to administer oaths. Any party or their attorney may attend and participate as they see fit. The deposition will continue day-to-day until completed.

DATE AND TIME
OF DEPOSITION: August 3, 2010 at 10:00 a.m.

PERSON
BEING
DEPOSED: Representative of LegalZoom.com, Inc.

PLACE OF
DEPOSITION: Bryon Cave LLP
One Kansas City Place
1200 Main Street, Ste. 3500
Kansas City, MO 64105

TOPICS OF
EXAMINATION: See Exhibit A attached.

BUTSCH SIMERI FIELDS LLC

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CERTIFICATE OF SERVICE

I certify that on July 23, 2010, I served this paper by mail as follows:

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 Wyrsh BRYAN CAVE LLP One Metropolitan Square – Ste. 3600 211 N. Broadway St. Louis, MO 63102 314.250.2000, 314.259.2020 (fax)

_____/s/ David T. Butsch_____

EXHIBIT A

INSTRUCTIONS AND DEFINITIONS

1. Unless otherwise noted, the time period encompassed by the following topics is limited to the period December 17, 2004 to the present.

2. The geographic scope of the following topics shall be limited to Defendant's customers residing in the State of Missouri.

WITNESS(ES) TO BE DEPOSED

An officer, director, managing agent or other representative of Defendant to testify on behalf of Defendant regarding the following subject matters:

1. A description of all services provided by Defendant relating to the preparation of legal documents, including, but not limited to, services relating to the following:

- (a) formation of business entities;
- (b) the creation of wills, living trusts and powers of attorney;
- (c) the preparation of trademarks, patents and copyrights,
- (d) divorces and name changes;
- (e) contracts;
- (f) bankruptcies;
- (g) real estate transactions;
- (h) small claims: and,
- (i) prenuptial agreements.

2. The method(s) by which the documents subject to a fee are prepared, including the Defendant's use of any computer or software program in the preparation of such documents.

3. The number of transactions in which Defendant received payment from a customer for the provision of services relating to the preparation of legal documents and the total amounts of such payments received.

4. The content of the database containing customer data as referred to in paragraph 5 of the declaration of Edward R. Hartman dated February 3, 2010.

5. The content of the report referred to in paragraph 7 of the declaration of Edward R. Hartman dated February 3, 2010.

6. Defendant's document retention policies.

7. The named Plaintiffs' transactions with Defendant.

8. Defendant's maintenance of tapes, discs or other computer readable medium which include all or part of the following data:

(a) the identity and address of the person or entity to whom a fee was charged;

(b) the dollar amount of the fee;

(c) the date the fee was charged and payment received; and

(d) a description or designation of the service provided.

9. The structure of Defendant's organization.