

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

TODD JANSON, GERALD T. ARDREY, CHAD M.  
FERRELL, and C & J REMODELING, on behalf of  
themselves and on behalf of all others similarly situated,

Plaintiffs,

Case No. \_\_\_\_\_

v.

LEGALZOOM.COM, INC.,

Defendant.

**DECLARATION OF EDWARD R. HARTMAN IN  
SUPPORT OF MOTION TO FILE DOCUMENT UNDER SEAL**

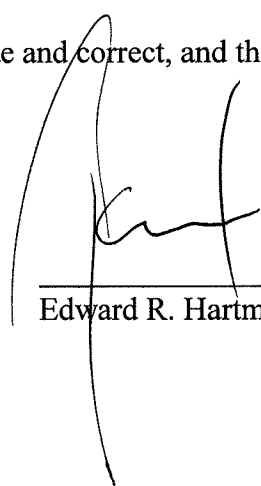
I, Edward R. Hartman, declare and state as follows:

1. I am over 21 years of age. If called upon to do so, I am competent to and would testify to the matters set forth herein, of which I have personal knowledge.
2. I am currently employed by LegalZoom.com, Inc. ("LegalZoom") as Chief Strategy Officer.
3. On February 5, 2010, LegalZoom filed a Notice of Removal in the above-captioned case, removing the putative class action of *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 v. Legalzoom.com, Inc.*, Case No. 09AC-CC00737, from the Circuit Court of Cole County, Missouri, to this Court. The removal was based on the Class Action Fairness Act ("CAFA"), 28 U.S.C. §§ 1332(d) and 1453.
4. In support of the removal, on February 3, 2010, I executed a Declaration in which I provided, based on personal knowledge, information demonstrating that the amount in

controversy over the five-year period applicable to the case exceeds the \$5,000,000 required by CAFA, and that the number of Missouri residents who paid fees to LegalZoom over that period exceeds the 100 represented persons required by CAFA.

5. LegalZoom is a privately-held company that does not publicly report its sales figures. LegalZoom's sales figures, including state-by-state sales figures and the particular sales figures for any given state, including the State of Missouri, are proprietary and confidential to LegalZoom and constitute LegalZoom's trade secrets and confidential commercial information. LegalZoom guards sales figures carefully and does not disclose this information publicly. Even within LegalZoom, access to this information is restricted to a limited number of employees. This information is of significant competitive value to LegalZoom, and public disclosure of this information, particularly state-specific sales figures, would be of significant value to LegalZoom's competitors in determining how to position themselves geographically to compete with LegalZoom.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this Declaration was executed on February 3, 2010.

  
2/3/2010  
\_\_\_\_\_  
Edward R. Hartman