

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’ MOTION FOR APPROVAL OF CLASS NOTICE AND TO
DIRECT DEFENDANT TO PROVIDE CLASS CONTACT INFORMATION**

Come now, Plaintiffs, by and through counsel, and hereby move this Court for an Order approving the proposed Notice attached hereto as Exhibit 1 to be sent to the class and approving the proposed distribution plan for class notice more fully set forth in Plaintiffs’ Suggestions in Support of this Motion. In further support of this Motion, Plaintiffs state as follows:

1. The Court granted Plaintiffs’ Motion for Class Certification on December 14, 2010. See, Document No. 61.

2. Plaintiffs propose a detailed Notice in the form attached hereto as Exhibit 1 be provided to the class advising the members of their rights and options for being excluded from the class. See, Proposed Class Notice attached hereto as Exhibit 1. The proposed Notice includes all of the requirements contained in Fed. R. Civ. P. 23(c)(2).

3. As more fully set forth in the Suggestions in Support of this Motion (which are incorporated herein by this reference), Plaintiffs propose to appoint Epiq Legal Noticing, a division of Epiq Systems to disseminate the Class Notice by sending the detailed notice to all class members by e-mail, as that is the manner in which Defendant delivered the documents at issue to the class. In addition, any e-mails which are returned as undeliverable will result in the detailed notice being mailed via U.S. Mail to the mailing address defendant provides for any such class member. Finally, plaintiffs request the Court allow class counsel to maintain a web site whereby class members can obtain the primary pleadings and Orders issued by this Court, as well as provide some answers to frequently asked questions, so that the class can quickly and efficiently obtain information about the issues in this case.

4. Finally, Plaintiffs request that the Court direct Defendant to provide them with contact information, including e-mail addresses, for the class members in a useable format.

WHEREFORE, Plaintiffs respectfully request this Court grant Plaintiffs' Motion for Approval of Class Notice and to Direct Defendant to Provide Class Contact Information, as more fully set forth in the Suggestions in Support of this Motion filed herewith, in addition to such other and further relief as this Court deems just and proper.

Respectfully submitted;

/s/ Matthew A. Clement

Timothy Van Ronzelen, #44382
Matthew A. Clement, #43833
Kari A. Schulte, #57739
COOK, VETTER, DOERHOFF & LANDWEHR
231 Madison
Jefferson City, Missouri 65101
Telephone: 573-635-7977
Facsimile: 573-635-7414
tvanronzelen@cvd.net
mclement@cvd.net
kschulte@cvd.net

and

Edward D. Robertson, Jr., # 27183
Mary Doerhoff Winter, # 38328
BARTIMUS, FRICKLETON, ROBERTSON
& GORNY
715 Swifts Highway
Jefferson City, MO 65109
Telephone: 573-659-4454
Facsimile: 573 659-4460
chiprob@earthlink.net
marywinter@earthlink.net

David T. Butsch, # 37539
James J. Simeri, #52506
BUTSCH SIMERI FIELDS LLC
231 S. Bemiston Ave., Ste. 260
Clayton, MO 63105
Telephone: 314-863-5700
Facsimile: 314-863-5711
butsch@bsflawfirm.com
simeri@bsflawfirm.com

Randall O. Barnes, #39884
RANDALL O. BARNES & ASSOCIATES
219 East Dunklin Street, Suite A
Jefferson City, Missouri 65101
Telephone: 573-634-8884
Facsimile: 573-635-6291
rbarnesjclaw@aol.com

Steven E. Dyer, #45397
LAW OFFICES OF STEVEN DYER
10850 Sunset Office Drive, Ste. 300
St. Louis, MO 63127
Telephone: 314-898-6715
jdcpamba@gmail.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that on January 31, 2011, I served this paper upon the following via this Court's ECF system:

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/Matthew A. Clement_____