

1 and email notices, establishment of fulfillment services, receipt and processing of opt-outs,
2 coordination with the United States Postal Service, claims database management, claim
3 adjudication, funds management, and distribution services. Epiq works with the parties, the
4 Court, and the class members in a neutral facilitation role, taking the Orders of the Court or the
5 negotiated terms of a settlement and implementing notice and administration services.

6
7 4. In this Declaration, I will review the proposed actions to be taken by Epiq to
8 implement a *Janson v LegalZoom com, Inc.* (“LegalZoom”) certification notice effort, should it
9 be ordered by the Court. I will also describe why, in my view, the notice effort to be undertaken
10 would be reasonable and would provide the best notice practicable under the circumstances of
11 this case, and satisfy due process.

12 **Overview of Epiq’s Responsibilities in the proposed LegalZoom notice**

- 13 5. Epiq’s responsibilities will include:
- 14 a. receiving Class member name and email/ mailing address data and
15 prepping for delivery;
 - 16 b. attempted delivery of the Court-approved Notice of Certification by
17 email, including up to 3 attempts to any email address that bounces as
18 undeliverable;
 - 19 c. searching the National Change of Address database for a more current
20 name and/or mailing address for each potential Class member with an
21 undeliverable email address;
 - 22 d. formatting and printing the Court-approved Notices of Certification to be
23 sent to the appropriate potential Class members;
 - 24 e. mailing the Notice of Certification and, where required, re-mailing, by
25 first-class mail to potential Class members with an undeliverable email
26 address;
 - 27 f. renting a post-office box to receive requests for exclusion and other
28 communications;

- 1 g. maintaining and monitoring a dedicated e mail address by which class
2 members may submit requests for exclusion and questions or
3 communicate to the administrator; and
4 h. receiving, logging, and processing requests for exclusion and other
5 communications from potential Class members.

6 **Individual Notice**

7 6 I understand that the plaintiff is seeking to certify a Class that includes all Missouri
8 residents who paid for the preparation of legal documents by the Defendant in alleged
9 contravention of Missouri law

10 7 I have been informed that names and email and physical addresses are available
11 for all potential Class members and that the Class likely numbers between 14,000 and 20,000
12 Therefore, individual notice will be the sole method of noticing the Class.
13

14 8. The Certification Notice will be emailed to all Class members. For any email that
15 is bounced back as undeliverable, up to 2 additional attempts will be made to re-send. All emails
16 that bounce back as undeliverable after 3 attempts will be logged by Epiq.

17 9. All Class members for whom email notice was ultimately undeliverable (or for
18 whom a valid email address may not have existed), Epiq will cross-reference the corresponding
19 physical mailing addresses with addresses found in the National Change of Address cards filed
20 with the United States Postal Service and update as needed. Epiq will then mail the Certification
21 Notice by First Class Mail to the most recent address available.
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23 10. Epiq will receive and log any mailings that are returned as undeliverable and re-
24 mail the Certification Notice to all Class members for whom the Post Office provides a
25 forwarding address
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Exclusion Requests and Other Communications

11. Epiq will rent a post office box (under the name of *Janson v LegalZoom*) and maintain and monitor a dedicated email address (under the name of lzoomclassaction@epiqsystems.com) to receive communications from potential Class members. Both the post office and email addresses will be included in the Certification Notice, and will be available through the website (www.lzoomclassaction.com) maintained by Class Counsel.


Conclusions

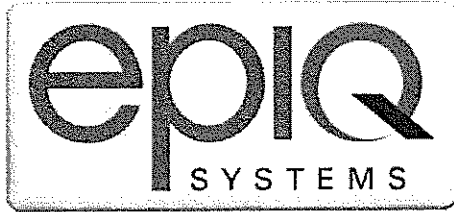
12. In my opinion, the Notice effort will comport with all aspects of Federal Rule of Civil Procedure Rule 23(c)(2), the Due Process Clause of the Constitution, and also the guidance for effective notice articulated in the FJC’s Manual for Complex Litigation, 4th. This plan is consistent with other notice programs approved by both state and Federal Courts and will comply with all Court rules and guidelines.

13. The Notice Plan meets the “desire to actually inform” standard well-embedded in due process law, requiring more than a “mere gesture.” See *Mullane v Central Hanover Trust*, 339 US 306, 315 (1950).

14. At the conclusion of the Notice effort, we will provide a final report verifying the effective implementation of the notice program.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Cameron R. Azari, Esq.



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EPIQ LEGAL NOTICING

Epiq Legal Noticing provides clients with quality, expert notice plan development and implementation for both class action and bankruptcy proceedings. Our solutions are based on in-depth research and over a decade of experience. Whether utilizing traditional or innovative methods, clients can depend on Epiq to plan and execute a successful notice program.

- ✓ Programs are quantified using the industry standard measurements of Reach and Frequency.
- ✓ Epiq's notice professionals are uniquely experienced in direct notice implementation including address updating, mailed notice and email.
- ✓ Through affidavits and testimony we attest to the execution and performance of our programs and their adequacy under relevant Federal and State law.
- ✓ Epiq designed notices have appeared all over the world and in dozens of languages.
- ✓ Notices are drafted with the FRCP 23(c)(2)(B)'s guidance to "clearly and concisely state in plain, easily understood language..."
- ✓ Our clients include plaintiff and defense counsel, defendant corporations and public interest advocacy groups.
- ✓ No media plan designed by Epiq has ever been successfully challenged on adequacy.

KEY BIO'S

Cameron Azari, Esq., Director of Legal Noticing

Legal Noticing Director Cameron Azari, Esq. has more than nine years experience in the design and implementation of legal notification and claims administration programs. He is a nationally recognized specialist in the creation of notification campaigns in compliance with Fed R. Civ. P. 23(c)(2)(d)(2) and (e) and similar state class action statutes. High profile class actions he has been involved in include companies such as Aetna, Humana, Wells Fargo, General Motors, Goodyear, Cigna, City of Miami, Budget Rent-a-Car, AT&T, AIG and T-Mobile. Cam is an active author and speaker on a broad array of legal notice and class action topics ranging from amendments to FRCP Rule 23, email noticing, response rates and optimizing settlement effectiveness. Cam is an active member of the Oregon State Bar. He received his B.S. from Willamette University and his J.D. from Northwestern School of Law at Lewis and Clark College. Cam can be reached at cazari@epiqsystems.com.

Lauran Schultz, Executive Director

Based in Philadelphia, Legal Noticing Director Lauran Schultz co-manages legal notice for Epiq Class Action & Claims Solutions. He consults extensively with clients on notice adequacy and innovative legal notice programs that are both efficient and effective. Lauran and his team develop comprehensive, fully integrated notification efforts including situational analysis, plan design, drafting, implementation and opinions of adequacy. The team supervises all aspects of notice implementation from media planning and buying to individual notification (print, email), press releases, case websites, PSA campaigns and third party outreach. High profile actions Lauran has been involved in include companies such as: TransUnion, Ford Motors, Chrysler, TJX, Certegy, AIG, Dominion Resource Services, CNA, Continental Tire, Wal-Mart, Carrier Corporation, Vivendi, Parmalat, ConAgra and Toyota. Among recent engagements, Lauran managed the 2008 notice program for *In Re Trans Union Privacy Litigation*. Possibly the largest class action in history, the *In re Trans Union* settlement included 190 million class members justifying a media effort spanning the internet, consumer magazines, newspapers, television and radio. Lauran has over a dozen years of consulting and management experience developing innovative marketing programs for nationally and internationally recognized brands such as National City, HSBC and Regions Bank along with affiliates of the American Automobile Association and Better Business Bureau. Prior to joining Epiq in 2005, Lauran was a Senior Vice President of Marketing at National City Bank in Cleveland, Ohio. Lauran's educational background includes advanced study of political theory at the University of Wisconsin-Madison, Cornell University and the London School of Economics along with a Ford Foundation fellowship from the Social Science Research Council and American Council of Learned Societies. Lauran can be reached at lschultz@epiqsystems.com

ARTICLES AND PRESENTATIONS

Cameron Azari Speaker, "Notice in Consumer Class Actions: Adequacy, Efficiency and Best Practices." CLE International's 5th Annual Class Action Conference: Prosecuting and Defending Complex Litigation, San Francisco, CA, 2009.

Lauran Schultz Speaker, "Efficiency and Adequacy Considerations in Class Action Media Notice Programs." Chicago Bar Association, Chicago, IL, 2009

Cameron Azari Author, "Clearing the Five Hurdles of Email - Delivery of Class Action Legal Notices" - Thomson Reuters Class Action Litigation Reporter – June, 2008

Cameron Azari Speaker, "Planning for a Smooth Settlement." ACI: Class Action Defense - Complex Settlement Administration for the Class Action Litigator, Phoenix, AZ, 2007.

Cameron Azari Speaker, "Noticing and Response Rates in Class Action Settlements" – Class Action Bar Gathering, Vancouver, British Columbia, 2007.

Cameron Azari Speaker, "Structuring a Litigation Settlement." CLE International's 3rd Annual Conference on Class Actions, Los Angeles, CA, 2007.

Cameron Azari Speaker, "Notice and Response Rates in Class Action Settlements" – Skadden Arps Slate Meagher & Flom, LLP, 2006.

Cameron Azari Speaker, "Notice and Response Rates in Class Action Settlements" – Bridgeport Continuing Legal Education, Class Action and the UCL, 2006.

Cameron Azari Speaker, "Notice and Response Rates in Class Action Settlements" – Stoel Rives litigation group, Portland/Seattle/Boise/Salt Lake City, 2005.

Cameron Azari Speaker, "Notice and Response Rates in Class Action Settlements" – Stroock Stroock & Lavan litigation group, Los Angeles, CA, 2005.

Cameron Azari Author, "Twice the Notice or No Settlement" – Current Developments – Issue II, August, 2003

Cameron Azari Speaker, "A Scientific Approach to Legal Notice Communication" – Weil Gotshal litigation group, New York, 2003.

Legal Notice Cases

Epiq Systems has served as notice expert for planning, implementation and/or analysis in the following partial listing of cases

2004	Norman Aper, et al , vs Grapevine Imports, LTD d/b/a Texas Toyota of Grapevine	048-195392-02	48th District Court of Tarrant County, Texas
2004	Mark Strawn v Farmers Insurance Co of Oregon, et al.	9908-0908	Circuit Court for the State of Oregon for the County of Multnomah
2004	Hans English Michel v. Archstone-Smith Operating Trust	03-008202	Circuit Court of the 17th Judicial Circuit in and for Broward County, Florida
2004	Martin Marootian, et al v. New York Life Insurance Company	C99-12073	United States District Court for the Central District of California
2004	McPherson et al v. Bank of Hawaii, et al	03-1-0494-03	Circuit Court of the first court state of Hawaii
2004	William B. Bunker v. County of Orange	79-17-99	California Superior Court for the County of Orange
2004	Jeanne Brumley v Conoco Phillips Company	CJ-2001-5	District Court of Texas County state of Oklahoma
2004	Dynergy, Inc ERISA Litigation	H-02-3076	United States District Court for the Southern District of Texas
2004	Karen Dowhite, et al. v. Elite Financial Services, Inc.	AMD 00-1945 and AMD-03-805	United States District Court for the District of Maryland
2004	Enron Corporation ERISA Litigation	H-01-3913	United States District Court for the Southern District of Texas
2004	The Exxon Valdez	A89-095-CV	United States District Court for the District of Alaska
2004	Chemical Release at Bogalusa	73341	Twenty Second Judicial District Court, Parish of Washington, State of Louisiana
2004	Laura White v. Hedstrom Corporation, et al.	03CC00274	Orange County Superior Court, Central Justice Center State of California
2004	Household Lending Litigation	02-1240	United States District Court for the Northern District of California
2004	Jeanie Luna, et al v Household Finance Corporation, III and Household Realty Corp.	03-02-02673-1	Superior Court of Washington for Whatcom County
2004	Warmack-Muskogee v. Pricewaterhouse Coopers LLP.	E2001-504-3	Circuit Court of Miller County Arkansas
2004	Patrick McGrath v. The City of Miami, et al	99-21456	Court of the 11th Judicial Circuit in and for Miami-Dade County
2004	Natural Gas Anti-Trust	4221, 4224, 4226 and 4228	California Superior Court for the County of San Diego
2004	Muzinich & CO , Inc., et al v Raytheon Company, et al.	01-284-S-BLW	United States District Court of Idaho
2004	Michelle Hansen v Ticket Track, INC	CV02-1032P	United States District Court for the Western District of Washington
2004	Johns-Manville Corporation, et al	82 B 115656	United States Bankruptcy Court for the Southern District of New York
2004	Kanefsky et al. v. Trex Co., Inc et al	L-7347-00	Superior Court of New Jersey Law Division
2004	Vastano v AT&T Wireless Services, Inc	99-CV-8267	District Court of Denver County, Colorado

2004	Worldcom, Inc ERISA Litigation	02 Civ 4816 (DLC)	United States District Court for the Southern District of New York
2005	Kenneth S Reynolds v. A&I Company, Granite State Insurance Company	01-C-538	Circuit Court of Kanawha County, West Virginia
2005	Southern States Police Benevolent Association v Protective Apparel Corporation of America, Inc.	5012961	17th Judicial Circuit Court for Broward County, Florida
2005	Olsen v. Behr Process Corporation	S006106	Supreme Court of British Columbia
2005	Sutter v Horizon Blue Cross Blue Shield of New Jersey	ESX-L3685-02	Superior Court of New Jersey Essex County
2005	re: Managed Care Litigation	MDL 1334	United States Courthouse Miami Florida
2005	re: Electronic Data Systems Corporation Securities Litigation	6:03-MD-1512	United States District Court for the Eastern District of Texas
2005	Mark Fabrics, Inc v GMAC Commercial Credit LLC	02/604631	Supreme Court of the State of New York County of New York
2005	Melissa Dukes v. Hewlett-Packard Company	CV-2002-270	Circuit Court of Phillips County, Arkansas
2005	Shane, et al v. Humana Inc , et al	04-21589-CIV-Moreno	United States District Court for the Southern District of Florida
2005	Hilton v. Oklahoma Farm Bureau Mutual Insurance Company	C-01-445	District Court of Pottawatomie County State of Oklahoma
2005	David Merryweather v Hewlett-Packard Company	2002-1591-4	170th Judicial District Court of McLennan County Texas
2005	Jerry Cooper, Inc. v OB PAG, Incorporated	04-2-12326-7	Superior Court of Washington for King County
2005	Cathy Terrill v Oakbrook Hilton Garden Suites and Inn, LLC	01 L 529	Circuit Court for the 18th Judicial Circuit Dupage County, Wheaton, Illinois
2005	Vega, et al. v. Mallory, et al	97AS06548	California Superior Court for the County of Sacramento
2006	Ticho v Budget Rent a Car System, Inc	GIC 836220	California Superior Court for the County of San Diego
2006	CMS Energy ERISA Litigation	02-72834	United States District Court for the Eastern District of Michigan
2006	FMS, Inc v Dell, Inc et al	03-2-23781	Superior Court of Washington for King County
2006	Julene Taylor et al v. Farmers Insurance Company of Washington	02-2-08934-8	Superior Court of Washington for King County
2006	re: Healthsouth Corp. ERISA Litigation	CV-03-BE-1700	United States District Court for the Northern District of Alabama
2006	Ashton, et al. v. Anthem, Inc , et al	04-20143-CIV-Moreno	United States District Court for the Southern District of Florida
2006	Cerbo et al v Ford of Englewood, Inc , et al	BER-L-2871-03	Superior Court of New Jersey, Law Division Bergen County
2006	Kafoury, et al. v. PGE	0501-0067	Circuit Court Multnomah County, Oregon
2006	Scarlett Moon Settlement	BC 286202	California Superior Court for the County of Los Angeles
2006	A&J Liquor Co, Inc. v. State Compensation Insurance Fund	975982	California Superior Court for the County of San Francisco
2006	Melvin Simon & Associates, Inc et al v. Standard Fire Insurance Company, et al.	97-RCCV-28	Superior Court of Richmond County, State of Georgia
2006	Robb v Stericycle, Inc.	467704-A	First Judicial District Court, Caddo Parish, Louisiana

2006	Feurabend v. UST, Inc. et al.	02-CV-7125	Circuit Court Milwaukee Wisconsin
2006	re: Visteon Corp ERISA Litigation	05-71205	United States District Court for the Eastern District of Michigan
2007	Rick Love, M D., et al v Blue Cross and Blue Shield Association, et al.	03-21296-CIV Moreno/Simonton	United States District Court for the Southern District of Florida
2007	Brasher, et al. v. Norfolk Southern California Corporation, et al.	CV-06-BE-0198-E	United States District Court for the Northern District of Alabama
2007	Eric Boos and James Rasmussen v. Chicago Pneumatic Tool Company	02-2-167306SEA	Superior Court for the State of Washington King County
2007	re: Delphi Corporation ERISA Litigation	05-md-1725	United States District Court of Michigan Southern Division
2007	Southern States Police Benevolent Association v. First Choice Armor & Equipment Inc. et al.	06CV10034-NMG	United States District Court of Massachusetts
2007	Karpus Management Inc. v. Brantley Capital Corporation	1:07-CV-01716	United States District Court for the Northern District of Ohio
2007	Ky Du v. WorldCom Inc. et al	00-10327	United States Bankruptcy Court Southern District of New York
2007	Donna Atchley v. Nations Title Agency, Inc.	0616-CV17169	Circuit Court of Jackson County, Missouri Kansas City
2007	Darren Pedersen v. Ford Motor Company	GIC821797	California Superior Court for the County of San Diego
2007	Natural Gas Anti-trust Cases	4221	California Superior Court for the County of San Diego
2007	Susanna Cook v. Dairyland Insurance Company	2000 L I	Circuit Court of the First Judicial Circuit Johnson County, Illinois
2007	Sprint Corporation Shareholder Litigation	04-CV 01714	District Court of Johnson County, Kansas Civil Court Department
2007	Stoney v SeaWorld	GIC 837803	California Superior Court for the County of San Diego
2007	Wong v. T-Mobile USA, Inc	05 CIV 73922	Theodore Levin United States Courthouse
2007	Jeanette Wagner v. Tracfone Wireless, Inc	06-CI-304	Commonwealth of Kentucky Boone County Circuit Court
2007	Ucan v. Bank of America	4221	California Superior Court for the County of San Francisco
2008	Barel v. Bank of America	06 2372	United States District Court for the Eastern District of Pennsylvania
2008	Baumsteiger, et al. v FleetBoston Financial Corporation et al.	408698	California Superior Court for the County of San Francisco
2008	Karen Bernard v MBNA America Bank	408700	California Superior Court for the County of San Francisco
2008	re: DJK Residential LLC	08-10375	Courtroom No. 601 New York
2008	re: General Motors Corporation Securities Litigation	06-md-1749	United States District Court for the Eastern District of Michigan
2008	re: The Goodyear Tire & Rubber Company ERISA Litigation	5:03-CV-2182-JRA	United States District Court for the Northern District of Ohio
2008	Nola Greeno v Allied Property and Casualty Insurance Company et al.	CV 06 113-M-DWM	United States District Court for the District of Montana
2008	Koch v Gateway Settlement	05CV2229	United States District Court for the Southern District of California

2008	re: Linens Anti-Trust Litigation	03 CIV 7823	United States District Court for the Southern District of New York
2008	Masztal v. City of Miami	98-11208 CA 31	Judicial Circuit for Miami-Dade County, Florida
2008	Barbara Rasnake et al v NetZero	BC356109	Superior Court of the State of California for the County of Los Angeles
2008	William Meaney, et al. v Onebeacon America Insurance Company, et al.	08-3281 BLS 2	Superior Court Commonwealth of Massachusetts
2008	re: Parmalat Securities Litigation	04 MD 1653	United States District Court for the Southern District of New York
2008	Jett Jones and Envo-Tech v. Alford-Chevrolet-Geo, et al.	30-96	District Court of Marion County, Texas
2008	Timberline 83 Limited Partnership v Burlington Resources Oil & Gas Company LP	CJ-02-23	District Court of Dewey County, Oklahoma
2008	re: Tricor Anti-Trust Litigation	05-340 SLR	United States District Court for the District of Delaware
2009	Jeremy S Weinberger, M.D. v Aetna Health, Inc	1:06-cv-20249-Moreno/Torres	United States District Court for the Southern District of Florida
2009	re: Crompton Corp. Securities Litigation	3:03-CV-1293	United States District Court for the District of Connecticut
2009	Ronald Drazin, et al. v Horizon Blue Cross Blue Shield of New Jersey, Inc. et al.	06-06219	United States District Court for the District of New Jersey
2009	Vermiglio et al. v. Group Health Plan, Inc	4:07cv-0282	United States District Court for the Eastern District of Missouri
2009	Collins v. Nationwide Mutual Insurance Company	99-CVH-06-04714	Court of Common Pleas of Franklin County, Ohio
2009	Carly Rose v. Nationwide Mutual Insurance Company	02 2 06621 1	Superior Court of the State of Washington for the County of Pierce
2009	Steinberg v. Nationwide Mutual Insurance Company	05-CV-033409	New York Supreme Court, Suffolk County
2009	Andonia v. The TJX Companies Inc	GIC875253	California Superior Court for the county of San Diego
2009	Bovay et al. v. Sears Roebuck Co.	01 CH 18096	Circuit Court of Cook County, Illinois
2009	Emma Menesas v Simply Right, Inc.	05CC00212	California Superior Court for the County of Orange
2009	Salcido v. Iovate Health Sciences, USA	BC387942	California Superior Court for the County of Los Angeles
2009	Alexander v. Nationwide Mutual Insurance Company	CV-2009-120-3	Circuit Court of Miller County, Arkansas
2009	Hutchinson v. Southern Farm Bureau Casualty Insurance Company	CV-2009-200-3	Circuit Court of Miller County, Arkansas
2009	Dennis v. Computer Sciences Corp	CV-2009-96-3	Circuit Court of Miller County, Arkansas
2009	Runyan v. Transamerica Life Insurance Company	CV 09 2066	Circuit Court of Pulaski County, Little Rock, Arkansas
2009	Strasen, et al. v Allstate Insurance Company	99-L-1040	Circuit Court for the Third Judicial Circuit Madison County, Illinois
2009	Fallon v. E.T. Browne Drug Co., Inc.	BC411117	Los Angeles County Superior Court
2009	State of Mississippi v Microsoft Corporation	G2004-1542	Chancery Court of Hind County, Mississippi, First Judicial District
2009	Daisy Mountain Fire District, et al v Microsoft Corporation	JFM-07-2851	United States District Court for the District of Maryland
2009	re: Parmalat Securities Litigation	04 MD 0030 (LAK)	United States District Court for the Southern District of New York

2009	re: Marvell Technology Group Ltd Securities Litigation	C-06-06286 RMW	United States District Court for the Northern District of California
2010	Beattie v. CenturyTel, Inc.	02-CV-10277	United States District Court Eastern District of Michigan
2010	re: HP Inkjet Printer Litigation	C05-3580 JF	United States District Court Northern District of California San Jose Division
2010	re: HP Laser Printer Litigation	CV 07-00667 AG	United States District Court Central District of California Santa Ana Division
2010	McAdams v. Monier, Inc.	SCV 16410	Superior Court of California
2010	Sanbrook v. Office Depot, Inc.	C 07-05938 RMW	United States District Court for the Northern District of California
2010	re: Puerto Rican Cabotage Antitrust Litigation	08-MD-1960 (DRD)	United States District Court for the District of Puerto Rico