

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

Come now, Plaintiffs, by and through counsel, and provide the following supplement to Plaintiffs’ Motion for Approval of Class Notice and to Direct LegalZoom to Provide Class Contact Information.

In the briefing related to Plaintiffs’ Motion for Approval of Class Notice, Defendant LegalZoom suggested to the Court that the class period should be cut off on the date the Certification Order was entered. LegalZoom argued that the reason for this cutoff date was “[w]hile LegalZoom does not necessarily maintain that its post-certification transactions with Missouri customers have been different from certified transactions, it does argue that there is no evidence in the record later transactions are not different.” See, Document #69, pp. 6-7. In response, Plaintiffs noted that corporate representatives of LegalZoom testified the post certification transactions were similar, but that the deposition transcripts were not available at the time of the filing of the Reply. See, Document 79, p. 6 (ft. nt. 3). Attached is testimony from Brian Liu, one of LegalZoom’s founders and its current Chairman of the Board of Directors, confirming that the method and process of creating the legal documents at issue in this case has

not changed since the founding of LegalZoom – let alone since class certification in this case. See, Liu Depo. 97:22 – 99:4 attached hereto as Exhibit 1. As such, Plaintiffs reiterate their position that the class period should extend beyond the date of the Certification Order as more specifically set forth in their Reply at Document #79, pp 6-8.

Respectfully submitted;

/s/ Matthew A. Clement

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**CERTIFICATE OF SERVICE**

I certify that on March 15, 2011, I served this document upon the following via this Court's ECF system:

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