

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 PARTIAL SUMMARY JUDGMENT

Come now, Plaintiffs, by and through counsel, and for their Motion for Partial Summary Judgment pursuant to Federal Rule of Civil Procedure 56, state as follows:

1. One of the issues raised in Plaintiffs’ Complaint is whether the documents sold by LegalZoom.com, Inc. (“LegalZoom”) are within the definitions found in Missouri’s Unauthorized Practice of Law statutes (§§ 484.010-.020, RSMo), which state in part that documents come within the Unauthorized Practice of Law statutes if they affect or relate to “secular rights.”

As more completely set forth in the Suggestions in Support of this Motion, this straightforward and narrow legal question is appropriate for summary judgment.

3. The uncontroverted material facts and reasons supporting why this Motion should be granted are more fully set forth in the Suggestions in Support of this Motion, which are filed contemporaneously herewith and are incorporated herein by this reference.

WHEREFORE, Plaintiffs respectfully request this Court grant their Motion for Partial Summary Judgment pursuant to Federal Rule of Civil Procedure 56 on the issue of whether the

documents at issue in this case affect or relate to secular rights, in addition to such other and further relief as this Court deems just and proper under the circumstances.

/s/ Timothy W. Van Ronzelen
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@cndl.net
mclement@cndl.net
kschulte@cndl.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 April 8, 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/Timothy W. Van Ronzelen