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IN THE UNITED STATES DISTRICT COURT
       FOR THE WESTERN DISTRICT OF MISSOURI
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,
                               ) No.
                               ) 2:10-cv-04018-NKL
    Plaintiffs,
vs.
LEGALZOOM.COM, INC.,
    Defendant.
      VIDEOTAPED DEPOSITION OF CHAD FERRELL
           Taken on behalf of Defendant
                   July 29, 2010
        Jennifer L. Herbeck, RPR, CSR, CCR
         Registered Professional Reporter
        Illinois CSR License No. 084-004271
           Missouri CCR License No. 733
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Exhibit F

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2 sasistance? 3 A. Yes. 4 Q. In person, by phone? 5 A. In person, Okay. Did you did you pay 7 this lawyer a retainer or 8 A. No. 9 Q. It was a strict contingency? 10 A. Yes. 11 Q. Did in the event that you're suing 12 here, did you yourself use LegalZoom's website? 13 A. Michelle, Jerry's wife, did all the stuff. 14 I was sitting there and gave her my credit card. 15 Q. And Jerry is Mr. Ardrey? 16 A. Yes. 17 Q. So you made the actual payment? 18 A. Yes. 19 Q. But you didn't type into the website? 19 Q. So you made the actual payment? 11 A. I was sitting with her, but I didn't type 11 anything. 12 here, did she do all the she used the 12 website? 13 A. Michelle, Jerry's wife, did all the stuff. 14 I was sitting with ency but I didn't type 15 A. Yes. 16 A. Yes. 17 Q. So you made the actual payment? 18 A. Yes. 19 Q. But you didn't type into the website? 20 A. I was sitting with her, but I didn't type 21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 A. No. 27 Q. Did you did any of the three of you 28 communicate with an attorney at LegalZoom? 29 A. No. 20 Did you tell anyone at LegalZoom that you 20 A. No. 21 Q. Did you tell anyone at LegalZoom that you 21 were seeking legal advice? 22 A. No. 23 Q. Did you tell anyone at LegalZoom that you 24 were seeking legal assistance? 25 A. No. 26 Q. Did you - had you ever used LegalZoom 27 A. No. 28 Q. Did you - had you ever used LegalZoom that you 29 were seeking legal assistance? 30 A. No. 31 Q. Did you tell anyone at LegalZoom that you 31 were seeking legal assistance? 32 A. No. 33 A. No. 34 A. No. 35 Q. Did you tell anyone at LegalZoom that you 36 A. Yes. 36 A. Yes. 37 A. Wo. 38 Q. Have you apart from a lease, can you 39 A. No. 40 A. No. 41 A. No. 42 A. No. 43 A. No. 44 A. No. 45 A. No. 46 A. No. 47 A. No. 48 A. No. 49 A. No. 40 A. No. 40 A. No. 41 A. No. 41 A. No. 42 A. No. 43 A. No. 44 A. No. 45 A. No. 46 A. No. 47 A. No. 48 A. No. 49 A. No. 40 A. No. 40 A. No. 41 A. No. 41 A. No		Page 18		Page 20
3 A. Yes. 4 Q. In person, by phone? 5 A. In person? 6 Q. In person? Okay. Did you did you pay 7 this lawyer a retainer or 8 A. No. 9 Q. It was a strict contingency? 10 A. Yes. 11 Q. Did in the event that you're suing 11 here, did you yourself use LegalZoom's website? 13 A. Michelle, Jerry's wife, did all the stuff. 14 I was sitting there and gave her my credit card. 15 Q. And Jerry is Mr. Ardrey? 16 A. Yes. 17 Q. So you made the actual payment? 18 A. Yes. 19 Q. But you didn't type into the website? 19 A. Yes. 10 A. Yes. 11 Q. Did you didn't type into the website? 21 anything. 22 anything. 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 A. Yes, we were sitting there, but 2 Q. Did you did any of the three of you communicate with an attorney at LegalZoom? 4 A. No. 5 Q. Did you bave e-mail contact with a person at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you were seeking legal assistance? 11 A. No. 12 Q. Did you tell anyone at LegalZoom that you were seeking legal assistance? 13 A. No. 14 Q. On what basis did you understand that it would be less expensive to use LegalZoom? 14 A. No. 15 Q. How loud get it done for that, that's a lot cheaper. Because a lawyer's 250 an hour, and it's going to take a lot more than an hour. 16 A. Probably a few hours. 17 Q. Can you be any more specific? 18 A. Yes. 19 Q. So you watched what she was entering? 19 A. Yes. 20 Q. Two hours maybe? Do you you said you were looking over Michelle's shoulder as she was doing this? 21 A. Yes. 22 Q. A. Yes. 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Have you ever used legal forms before? 27 A. No. 28 Q. How you speak to anyone at LegalZoom? 29 A. No. 20 Did you tell anyone at LegalZoom that you were seeking legal assistance? 20 A. No. 21 Q. Did you tell anyone at LegalZoom that you were seeking legal assistance? 21 A. No. 22 Q. Had you had you ever used LegalZoom that you were seeking legal assistance? 30 A. No. 31 Q. How you -a did that the stuff. 32 Q. Have yo	1	Q. And did he tell you he would provide legal	1	family lawyer, your parents' lawyer, what he charged
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13 A. Michelle, Jerry's wife, did all the stuff. 14 I was sitting there and gave her my credit card. 15 Q. And Jerry is Mr. Ardrey? 16 A. Yes. 17 Q. So you made the actual payment? 18 A. Yes. 19 Q. But you didn't type into the website? 20 A. I was sitting with her, but I didn't type 21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 A. Yes, 27 Q. Did you did any of the three of you 3 communicate with an attorney at LegalZoom? 4 A. No. 4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 6 A. No. 7 Q. Did you speak to anyone at LegalZoom? 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you twere seeking legal assistance? 11 A. No. 12 Q. Have you used a lease as a landlord? 13 Q. Can you be any more specific? 14 A. Two. 15 Q. Two hours maybe? Do you you said you 16 were looking over Michelle's shoulder as she was 17 doing this? 20 A. Yes. 21 Q. So you watched what she was entering? 22 A. Yes. 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Have you ever used legal forms before? 27 Have you rented property, for example? 3 A. Yes. 4 Q. Have you seen form leases? 4 A. Yes. 4 Q. Have you used a lease as a landlord? 5 A. Yes. 6 Q. Have you used a lease as a landlord? 7 A. No. 8 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you were seeking legal assistance? 11 tenant? 12 A. Yes. 13 Q. Your - in your job now, are you a are you under an employment contract, or is it 14 A. No. 15 A. No. 16 Q. Had you had you ever used LegalZoom that you before prior to this LLC? 17 A. Yes. 18 A. Yes. 19 Q. Can you be any more specific? 16 Were looking over Michelle's shoulder as she was 10 doing this? 20 A. Yes. 21 Q. Ard did she she would ask you if there 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Have you over used legal forms before prior to this LLC? 27 A. Yes. 28 A. Yes. 29 Did you beak to anyou			1	
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16 A. Yes. 17 Q. So you made the actual payment? 18 A. Yes. 19 Q. But you didn't type into the website? 20 A. I was sitting with her, but I didn't type 21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 A. Yes. 27 Q. Did you did any of the three of you 28 communicate with an attorney at LegalZoom? 4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 4 A. No. 6 Q. Did you have e-mail contact with a person at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 16 Were looking over Michelle's shoulder as she was 17 doing this? 18 A. Yes. 19 Q. So you watched what she was entering? 20 A. Yes. 21 Q. And did she she would ask you if there 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Have you ever used legal forms before? 27 Have you rented property, for example? 28 A. Yes. 29 A. Yes. 29 A. Yes. 20 A. Yes. 20 A. Yes. 21 Q. And did she she would ask you if there yea a question on the screen? 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Have you ever used legal forms before? 27 Have you rented property, for example? 30 A. Yes. 40 Q. Have you do you own real estate? 41 A. No. 42 Q. Have you do you own real estate? 43 A. No. 44 Q. Have you do you own real estate? 44 A. No. 45 Q. Have you do you own real estate? 45 A. No. 46 Q. Have you do you own real estate? 46 Q. Have you in your job now, are you a are you under an employment contract, or is it and you under an employment contract, or is it and you under an employment contract, or is it and you under an employment contract, or is it and you under an employment contract, or is it			£ .	
17 doing this? 18 A. Yes. 19 Q. But you didn't type into the website? 20 A. I was sitting with her, but I didn't type 21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 A. Yes. 27 Q. You didn't and Mr. Ardrey didn't? 28 Yes. 29 A. Yes. 29 A. Yes. 20 And did she she would ask you if there 20 Was a question on the screen? 21 Q. It was fill in the blank basically? 22 A. Yes. 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Did you did any of the three of you 27 communicate with an attorney at LegalZoom? 28 A. No. 29 Q. Did you speak to anyone at LegalZoom? 30 A. No. 31 Q. Did you tell anyone at LegalZoom that you 41 were seeking legal advice? 42 A. No. 43 Q. Bave you seen form lease as a landlord? 44 A. No. 45 Q. Did you tell anyone at LegalZoom that you 46 A. No. 47 Q. Did you tell anyone at LegalZoom that you 48 were seeking legal advice? 49 A. No. 40 Q. Did you tell anyone at LegalZoom that you 40 Were seeking legal assistance? 41 A. No. 42 Q. Have you seen form lease as a landlord? 43 A. No. 44 Q. Have you seen form lease as a landlord? 45 A. No. 46 Q. But have you signed a form lease as a landlord? 46 A. No. 47 Q. Did you tell anyone at LegalZoom that you 48 Were seeking legal advice? 49 A. No. 40 Q. But have you signed a form lease as a landlord? 40 Q. But have you signed a form lease as a landlord? 41 you under an employment contract, or is it			I	
18 A. Yes. 19 Q. But you didn't type into the website? 20 A. I was sitting with her, but I didn't type 21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 A. Yes. 27 Q. You didn't and Mr. Ardrey didn't? 28 A. Yes. 29 You didn't and Mr. Ardrey didn't? 29 A. Yes. 20 A. Yes. 21 question on the screen? 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Did you did any of the three of you 27 communicate with an attorney at LegalZoom? 28 A. No. 29 Q. Did you speak to anyone at LegalZoom? 30 A. No. 31 Q. Did you have e-mail contact with a person at LegalZoom? 32 A. No. 33 Q. Did you tell anyone at LegalZoom that you were seeking legal advice? 34 A. No. 35 Q. Did you tell anyone at LegalZoom that you were seeking legal advice? 36 A. No. 37 Q. Did you tell anyone at LegalZoom that you were seeking legal advice? 38 A. No. 39 A. No. 40 Q. Did you tell anyone at LegalZoom that you were seeking legal assistance? 41 A. No. 42 Q. Have you do you own real estate? 43 A. No. 44 Q. Have you do you own real estate? 44 No. 45 Q. Did you tell anyone at LegalZoom that you were seeking legal advice? 46 A. No. 47 Q. Did you tell anyone at LegalZoom that you were seeking legal advice? 48 A. No. 49 A. No. 40 Pave you do you own real estate? 40 Q. But have you signed a form lease as a landlord? 41 tenant? 41 Ves. 41 C. Have you in your job now, are you a are you under an employment contract, or is it in your under an employment contract, or is it in your in your job now, are you a are you under an employment contract, or is it in your in			1	
19 Q. But you didn't type into the website? 20 A. I was sitting with her, but I didn't type 20 A. Yes. 21 anything. 22 Q. So did she do all the she used the 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Did you didn't and Mr. Ardrey didn't? Page 19			ž .	•
20 A. I was sitting with her, but I didn't type 21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? Page 19 1 A. Yes, we were sitting there, but 2 Q. Did you did any of the three of you 3 communicate with an attorney at LegalZoom? 4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 6 A. No. 7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you have e-r used Legal forms before was a question on the screen? 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Have you ever used legal forms before? 27 Have you rented property, for example? 28 A. Yes. 29 A. Yes. 29 A. Yes. 20 Did you speak to anyone at LegalZoom? 20 Did you have e-mail contact with a person 31 A. Yes. 40 Lave you ever used legal forms before? 41 A. No. 42 Q. Have you seen form leases? 43 A. Yes. 44 Q. Have you ever used legal forms before? 44 A. Yes. 45 A. No. 46 Q. Have you used a lease as a landlord? 40 A. No. 41 Q. But have you signed a form lease as a tenant? 41 A. Yes. 41 Q. Have you in your job now, are you a are you under an employment contract, or is it 40 A. No. 41 Q. A. No. 42 Q. Did you tell anyone at LegalZoom that you 43 D. Your in your job now, are you a are you under an employment contract, or is it 41 A. No. 42 Q. Have you apart from a lease, can you think of any other legal forms you've ever used?		i di	1	
21 anything. 22 Q. So did she do all the she used the 23 website? 24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? 26 Q. Did you did any of the three of you 27 a communicate with an attorney at LegalZoom? 28 A. No. 29 Q. Did you speak to anyone at LegalZoom? 30 A. No. 4 A. No. 5 Q. Did you have e-mail contact with a person 31 at LegalZoom? 4 A. No. 6 A. No. 7 Q. Did you have e-mail contact with a person 31 at LegalZoom? 4 A. No. 6 A. No. 7 Q. Did you have e-mail contact with a person 31 at LegalZoom? 4 A. No. 5 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 21 Q. And did she she would ask you if there 22 was a question on the screen? 23 A. Yes. 24 Q. It was fill in the blank basically? 25 A. Yes. 26 Q. Id wey ou ever used legal forms before? 27 Have you ever used legal forms before? 28 A. Yes. 49 Q. Have you ever used legal forms before? 29 A. Yes. 60 Q. Have you do you own real estate? 70 A. No. 71 Q. But have you used a lease as a landlord? 91 A. No. 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 19 Under an employment contract, or is it 15 A. No. 16 Q. Have you apart from a lease, can you think of any other legal forms you've ever used?			ŧ .	
22			ł	
23		· ·	ŧ	
24 A. Yes. 25 Q. You didn't and Mr. Ardrey didn't? Page 19 1 A. Yes, we were sitting there, but 2 Q. Did you did any of the three of you 3 communicate with an attorney at LegalZoom? 4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 6 A. No. 7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you have er used of them? 24 Q. It was fill in the blank basically? 25 A. Yes. 1 Q. Have you ever used legal forms before? 1 A. Yes. 1 Q. Have you seen form leases? 3 A. Yes. 4 Q. Have you do you own real estate? 4 A. No. 8 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. But have you signed a form lease as a landlord? 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 19 Have you ever used legal forms before? 1 Q. Have you over used legal forms before? 1 Q. Have you over used legal forms before? 1 A. Yes. 1 Q. Have you over used legal forms before? 1 A. Yes. 1 Q. Have you in your job now, are you a are you under an employment contract, or is it 15 A. No. 16 Q. At will, by mouth? 17 A. Yes. 18 Q. Have you apart from a lease, can you think of any other legal forms you've ever used?				<u>-</u>
Page 19 A. Yes, we were sitting there, but Q. Did you did any of the three of you 3 communicate with an attorney at LegalZoom? A. No. Did you speak to anyone at LegalZoom? A. No. Did you have e-mail contact with a person at LegalZoom? A. No. Did you tell anyone at LegalZoom that you were seeking legal advice? A. No. Q. Did you tell anyone at LegalZoom that you were seeking legal assistance? A. No. Q. Did you tell anyone at LegalZoom that you before prior to this LLC? A. No. Page 19 Page 19 Page 19 Page 19 Page 19 Page 19 A. Yes. A. Yes. Q. Have you ever used legal forms before? A. Yes. Q. Have you seen form leases? A. No. Q. So have you used a lease as a landlord? A. No. Q. But have you signed a form lease as a 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are 4 you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 16 Q. Had will, by mouth? A. Yes. 18 Q. Have you apart from a lease, can you 19 United the form is page 1. Page 19 Page 19 A. Yes. A. Yes. A. Yes. 1 Q. Have you in your job now, are you a are 14 you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 A. Yes. 18 Q. Have you apart from a lease, can you 19 think of any other legal forms you've ever used?			ı	
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1 A. Yes, we were sitting there, but 2 Q. Did you did any of the three of you 3 communicate with an attorney at LegalZoom? 4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 6 A. No. 7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 1 Q. Have you ever used legal forms before? 2 Have you rented property, for example? 3 A. Yes. 4 Q. Have you seen form leases? 5 A. Yes. 6 Q. Have you do you own real estate? 7 A. No. 9 A. No. 10 Q. But have you signed a form lease as a landlord? 12 A. Yes. 13 Q. Your in your job now, are you a are you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 A. Yes. 18 Q. Have you apart from a lease, can you 19 think of any other legal forms before? 1 A. Yes. 1 Q. Have you rented property, for example? 3 A. Yes. 4 Q. Have you id you own real estate? 7 A. No. 10 Q. But have you signed a form lease as a landlord? 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are you under an employment contract, or is it 15 A. No. 16 Q. At will, by mouth? 17 A. Yes. 18 Q. Have you apart from a lease, can you think of any other legal forms you've ever used?	25	Q. You didn't and Mr. Ardrey didn't?	25	A. Yes.
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2 Q. Did you did any of the three of you 3 communicate with an attorney at LegalZoom? 4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 6 A. No. 7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 2 Have you rented property, for example? 3 A. Yes. 4 Q. Have you do you own real estate? 7 A. No. 8 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. But have you signed a form lease as a landlord? 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are 14 you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 A. Yes. 18 Q. Have you rented property, for example? 3 A. Yes. 4 Q. Have you do you own real estate? 7 A. No. 8 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. But have you signed a form lease as a 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are 14 you under an employment contract, or is it 15 A. No. 16 Q. At will, by mouth? 17 A. Yes. 18 Q. Have you apart from a lease, can you 19 think of any other legal forms you've ever used?	1	A. Yes, we were sitting there, but	1	Q. Have you ever used legal forms before?
4 A. No. 5 Q. Did you speak to anyone at LegalZoom? 6 A. No. 7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 4 Q. Have you seen form leases? 5 A. Yes. 6 Q. Have you do you own real estate? 7 A. No. 8 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. But have you signed a form lease as a landlord? 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are you under an employment contract, or is it 15 A. No. 16 Q. At will, by mouth? 17 A. Yes. 18 Q. Have you apart from a lease, can you think of any other legal forms you've ever used?	2		2	
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6 A. No. 7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 6 Q. Have you do you own real estate? 7 A. No. 8 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. But have you signed a form lease as a landlord? 10 Q. But have you signed a form lease as a landlord? 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are landlord? 14 you under an employment contract, or is it landlord? 15 A. No. 16 Q. Had you had you ever used LegalZoom 16 Q. At will, by mouth? 17 A. Yes. 18 Q. Have you apart from a lease, can you think of any other legal forms you've ever used?	4	A. No.	4	Q. Have you seen form leases?
7 Q. Did you have e-mail contact with a person 8 at LegalZoom? 9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 A. No. 18 Q. So have you used a lease as a landlord? 9 A. No. 10 Q. But have you signed a form lease as a landlord? 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are 14 you under an employment contract, or is it 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 A. Yes. 18 A. No. 19 Q. Had you had you heard of them? 19 think of any other legal forms you've ever used?		Q. Did you speak to anyone at LegalZoom?	5	A. Yes.
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9 A. No. 10 Q. Did you tell anyone at LegalZoom that you 11 were seeking legal advice? 12 A. No. 13 Q. Did you tell anyone at LegalZoom that you 14 were seeking legal assistance? 15 A. No. 16 Q. Had you had you ever used LegalZoom 17 before prior to this LLC? 18 A. No. 19 Q. Had you had you heard of them? 9 A. No. 10 Q. But have you signed a form lease as a 11 tenant? 12 A. Yes. 13 Q. Your in your job now, are you a are 14 you under an employment contract, or is it 15 A. No. 16 Q. At will, by mouth? 17 A. Yes. 18 Q. Have you apart from a lease, can you 19 think of any other legal forms you've ever used?	7	Q. Did you have e-mail contact with a person	7	
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14were seeking legal assistance?14you under an employment contract, or is it15A. No.15A. No.16Q. Had you had you ever used LegalZoom16Q. At will, by mouth?17before prior to this LLC?17A. Yes.18A. No.18Q. Have you apart from a lease, can you19Q. Had you had you heard of them?19think of any other legal forms you've ever used?			į.	
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17before prior to this LLC?17A. Yes.18A. No.18Q. Have you apart from a lease, can you19Q. Had you had you heard of them?19think of any other legal forms you've ever used?	1		ì	
18 A. No. 19 Q. Had you had you heard of them? 18 Q. Have you apart from a lease, can you 19 think of any other legal forms you've ever used?	1			• •
Q. Had you had you heard of them? 19 think of any other legal forms you've ever used?		<u> - </u>	•	
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1/11 A No not Michalla told majohorit it Sha 5/11 A No			}	· · · · · · · · · · · · · · · · · · ·
	20	A. No, not Michelle told me about it. She	20	A. No.
21 had heard of them. 21 Q. You haven't started an LLC before this?				*
Q. Tell me why did you use LegalZoom? 22 A. No.			1	
A. Because it was going to be cheaper to set 23 Q. Have you are you married now?				
24 up the company. 25 O Province did not be some and the same and the			Ŧ	
25 Q. Do you did you happen to know what your 25 Q. And are you married to the same	L 25	Q. Do you did you happen to know what your	125	Q. And are you married to the same

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1	A. It's all	1	void? Did I read that right?
2	Q. It's a little hard to see.	2	A. Yes.
3	A. You will operate	3	Q. When you used the LegalZoom website, did
4	Q. Does it say you will have an opportunity	4	LegalZoom give you legal advice?
5	to review your information before your purchase?	5	A. No.
6	A. Yes.	6	Q. Did LegalZoom give you an opinion?
7	Q. By clicking the proceed to check-out	7	A. No.
8	button, you agree to our terms of service?	8	Q. Did LegalZoom give you a recommendation
9	A. Yes.	9	about your legal rights?
10	Q. You Michelle did click the proceed to	10	A. No.
11	check-out button?	11	Q. Did LegalZoom give you a recommendation
12	A. Yes.	12	about remedies?
13	Q. You did purchase. Do you recall if while	13	A. No.
14	you were using the LegalZoom website you or Michelle	14	Q. Did LegalZoom give you a recommendation
15	or Mr. Ardrey together reviewed the terms of	15	about defenses?
16	service?	16	A. No.
17	A. Yes.	17	Q. Did LegalZoom give you a recommendation
18	Q. You think you did?	18	about options?
19	A. Yes.	19	A. Maybe. I don't know. I don't remember.
20	Q. You remember it?	20	Q. Did LegalZoom give you a recommendation
21	A. Yes.	21	about strategies?
22	Q. I'm sorry. I'm just going to hand you	22	A. I don't remember.
23	what was marked this morning as Exhibit 5.	23	Q. You see Paragraph 4 there. I understand
24	MR. SIMERI: Do you want 4 back?	24	that LegalZoom's review of my answers is limited to
25	MR. WICKS: Sure.	25	completeness, spelling, and grammar and for internal
	Page 31		Page 33
1	Q. (By Mr. Wicks) Does that look familiar?	1	consistency of names, addresses, and the like. Did
2	A. I don't recall.	2	I read that correctly?
3	Q. Well, if you said a minute ago you	3	A. Uh-huh, yes.
4	remember looking at the terms of service	4	Q. What does that mean to you?
5	A. Well		
		5	A. That you have to put everything in
6	Q but you don't remember this? Could you	6	correctly.
7	read the first paragraph there for me at the top,	6 7	correctly. Q. And does it mean to you that LegalZoom is
7 8	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out	6 7 8	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for
7 8 9	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud?	6 7 8 9	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of
7 8 9 10	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is	6 7 8 9 10	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.?
7 8 9 10 11	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform	6 7 8 9 10 11	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes.
7 8 9 10 11 12	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am	6 7 8 9 10 11 12	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I
7 8 9 10 11 12 13	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no	6 7 8 9 10 11 12 13	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following.
7 8 9 10 11 12 13 14	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created	6 7 8 9 10 11 12 13	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes.
7 8 9 10 11 12 13 14 15	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom.	6 7 8 9 10 11 12 13 14 15	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines
7 8 9 10 11 12 13 14 15	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather	6 7 8 9 10 11 12 13 14 15 16	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right
7 8 9 10 11 12 13 14 15 16	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter?	6 7 8 9 10 11 12 13 14 15 16	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice
7 8 9 10 11 12 13 14 15 16 17	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes.	6 7 8 9 10 11 12 13 14 15 16 17 18	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice,
7 8 9 10 11 12 13 14 15 16 17 18	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes. Q. The does the prior I'm sorry. Does	6 7 8 9 10 11 12 13 14 15 16 17 18	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice, explanation, opinion, or recommendation to a
7 8 9 10 11 12 13 14 15 16 17 18 19 20	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes. Q. The does the prior I'm sorry. Does the second paragraph say if prior to my purchase I	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice, explanation, opinion, or recommendation to a consumer about possible legal rights, remedies,
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes. Q. The does the prior I'm sorry. Does the second paragraph say if prior to my purchase I believe that LegalZoom gave me any legal advice,	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice, explanation, opinion, or recommendation to a consumer about possible legal rights, remedies, defenses, options, selection of forms, or
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes. Q. The does the prior I'm sorry. Does the second paragraph say if prior to my purchase I believe that LegalZoom gave me any legal advice, opinion, or recommendation about my legal rights,	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice, explanation, opinion, or recommendation to a consumer about possible legal rights, remedies, defenses, options, selection of forms, or strategies? Did I read that right?
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes. Q. The does the prior I'm sorry. Does the second paragraph say if prior to my purchase I believe that LegalZoom gave me any legal advice, opinion, or recommendation about my legal rights, remedies, defenses, options, selection of forms, or	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice, explanation, opinion, or recommendation to a consumer about possible legal rights, remedies, defenses, options, selection of forms, or strategies? Did I read that right? A. Yes.
7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	read the first paragraph there for me at the top, the paragraph numbered one? Could you read it out loud? A. I understand and agree that LegalZoom is not a law firm or an attorney and may not perform services performed by any attorney whether I am respected myself in this legal matter, no attorney/client relationship or privilege is created within LegalZoom. Q. Does that second sentence there say rather I am representing myself in this legal matter? A. Yes. Q. The does the prior I'm sorry. Does the second paragraph say if prior to my purchase I believe that LegalZoom gave me any legal advice, opinion, or recommendation about my legal rights,	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	correctly. Q. And does it mean to you that LegalZoom is only reviewing what you put into the form for completeness, spelling, and internal consistency of names, etc.? A. Yes. Q. Do you see Paragraph 5 there? It says I have read and understand the following. A. Yes. Q. A couple lines down, four or five lines down, do you see where it says over on the right LegalZoom is not permitted to engage in the practice of law including providing any kind of advice, explanation, opinion, or recommendation to a consumer about possible legal rights, remedies, defenses, options, selection of forms, or strategies? Did I read that right?

	Page 34		Page 36
1	second page there?	1	4:22 p.m.
2	Do you see the very last Paragraph 13? If	2	Q. (By Mr. Wicks) Okay. Mr. Ferrell, you
3	I do not agree to all of these terms, I will	3	said Mr. Ardrey told you about this lawsuit. What
4	immediately cease my use of this site?	4	did he say?
5	A. Yes.	5	A. He said that told me there was a class
6	Q. Did I read that correctly?	6	action lawsuit about against LegalZoom. They
7	A. Yes.	7	were practicing law in the state of Missouri, and
8	Q. And you did complete your purchase with	8	they're not lawyers from the state of Missouri.
9	the LLC form on LegalZoom. Correct?	9	Q. Did he do you know was he a plaintiff
10	A. Yes.	10	at the time?
11	Q. Actually, do you still have this in front	11	A. I don't know.
12	of you? Could you look at Paragraph 6 there. I	12	Q. And you think this conversation occurred
13	understand the site's general terms of use also	13	in February or March of this year?
14	apply to these terms of service.	14	A. I talked to him before that, but I
15	I acknowledge that I have read and agreed	15	haven't I couldn't even tell you what month it
16	to those terms of use which are incorporated herein	16	was.
17	by reference. Did I read that correctly?	17	Q. Okay. Did he tell you anything else? Was
18	A. Yes.	18	this a long conversation?
19	Q. More or less. Do you recall reading the	19	A. No, not really.
20	terms of use when you were on the website, the	20	Q. And did he tell you anything else?
21	LegalZoom website?	21	A. No.
22	A. I don't recall.	22	(Whereupon, the court reporter marked
23	Q. But you might have?		Ferrell Exhibit No. 1, Operating Agreement, for
24	A. Yes.		identification.)
25	Q. Actually, while I have you, I'll ask you	25	Q. Let's mark Ferrell 1. Have you seen that
	Page 35		Page 37
1	about this. I suspect your lawyers know the answer	1	before, Ferrell 1?
2	to this, but Mr. Janson didn't this morning. Could	2	A. Yes.
3	I have Janson 7, please. It was marked this	3	Q. Could you tell me what it is?
4	morning.	4	A. That's the that's our operating
5	This was marked this morning as Janson	5	agreement for the company.
6	Exhibit 7. Have you ever seen that before?	6	Q. Could you flip to Page 8? It's your
7	A. No.	7	signature page. Is that right?
8	Q. Do you know what it is? Did it come from	8	A. Yes.
9	you? Was it provided did you provide it to your	9	Q. And you have not signed this, have you?
10	lawyers?	10	A. I don't I don't know. I don't recall.
11	A. I might have. I had a whole document with	11	Q. Is C&J Remodeling an operating company
12	all my paperwork, but I don't know what it was.	12	now? Do you have a business?
13	Q. But you might have provided it to your	13	A. It's open, but we're not doing no
14	lawyers?	14	business.
15	A. I might have.	15	Q. Have you ever done business with it?
16	Q. Okay.	16	A. No.
17	MR. SIMERI: Jim, are you done with that?	17	Q. Has it had customers?
18	MR. WICKS: Yeah.	18	A. No.
19	MR. SIMERI: Can we take five?	19	Q. Any income at all?
20	MR. WICKS: Yeah, why don't we do that	20	A. No.
21	now?	21	Q. Do you have you advertised?
22	VIDEOGRAPHER: Going off the record at	22	A. Yes.
23	4:15 p.m.	23	Q. How?
24	(A break was taken.)	24	A. Phone book.
25	VIDEOGRAPHER: Going back on the record at	25	Q. Yellow Pages?

	Page 38		Page 40
1	A. Yes.	1	Q. Okay. I'll mark Ferrell 3. Could you
2	Q. And was that was that ad purchased by	2	flip to the third page? What is this document that
3	the company?	3	I've just shown you?
4	A. It was purchased I paid for it by	4	A. Articles of incorporation.
5	myself.	5	Q. And you may want to see does that look
6	Q. Does C&J Remodeling have a bank account?	6	similar to that?
7	A. No.	7	A. Yeah.
8	Q. Can you flip to Page 9? This recites the	8	Q. And I'm asking you if Ferrell 3 looks
9	capital contribution. You and Mr. Ardrey are each	9	similar to Ferrell 2, and your answer was that they
10	50 percent contributors. Is that correct?	10	do. What what's the third page of Ferrell 3?
11	A. Yes.	11	What does it say at the top?
12	Q. Where is that \$1,000 of capital held?	12	A. Article 5.
13		13	
14	A. Never never got put in.	1	Q. No, I'm sorry. The third page.
15	Q. If you someone responded to your ad in	14	A. Oh, the number
16	the phone book, could you does C&J have	15	Q. Back one.
17	employees?	16	A. Oh, I'm sorry.
18	A. No. Myself and Jerry.	17	Q. That's okay. Have you seen a document
	Q. And would you perform the work?	18	like this before?
19	A. Yes, if somebody called.	19	A. I'm not sure.
20	Q. If somebody called. What do you recall	20	Q. Do you know what what Ferrell 3 is?
21	what your ad said, your ad in the phone book?	21	A. No.
22	A. C&J Remodeling and the phone number.	22	Q. Is it is it a form articles of
23	Q. Did it say what you do?	23	incorporation with blank spaces in it?
24	A. No.	24	MR. SIMERI: Objection. Asked and
25	Q. No description?	25	answered.
ļ.	Page 39	And the second designation of the second des	Page 41
1	A. No.	1	A. Yes.
2	Q. That was it, C&J Remodeling?	2	Q. (By Mr. Wicks) I'm sorry. What was your
3	A. Yes.	3	answer, Mr. Ferrell?
4	(Whereupon, the court reporter marked	4	MR. SIMERI: You can answer it. He's
5	Ferrell Exhibit No. 2, Articles of Organization, for	5	asked the same question twice, though.
.6	identification.)	6	A. Yes.
7	Q. All right. I'll mark Ferrell 2. Does	7	(Whereupon, the court reporter marked
8	that look familiar, Ferrell 2?	8	Ferrell Exhibit No. 4, LegalZoom Home Page, for
9	A. I don't recall.	9	identification.)
10	Q. You don't recall seeing it before?	10	Q. (By Mr. Wicks) I'm going to mark
11	A. Yes, yes.	11	Ferrell 4. Does that look familiar?
12	Q. What is it?	12	A. No.
13	A. Articles of organization.	13	Q. Do you were you present the entire time
14	Q. And when did you see it, do you know?	14	when Michelle was entering your information in the
15	A. When I got all my paperwork from	15	blanks on the LegalZoom website?
16	LegalZoom.	16	A. Yes.
17	Q. So this is the this is the articles of	17	Q. Is it possible that you weren't there when
18	organization for C&J Remodeling?	18	she opened the website?
19	A. Yes.	19	A. No.
20	Q. The same C&J Remodeling that you placed an	20	Q. And you don't recognize this as the front
21	ad for in the phone book. Right?	21	page of the LegalZoom website?
22	A. Yes, yeah.	22	A. I don't recall.
23	(Whereupon, the court reporter marked	23	(Whereupon, the court reporter marked
24	Ferrell Exhibit No. 3, Articles of Incorporation,	24	Ferrell Exhibit No. 6, Information for LegalZoom LLC
25	for identification.)	25	Form, for identification.)
			,,

Page 44 Page 42 1 1 MR. WICKS: And we'll come back. Q. Okay. There we go. It was at the bottom 2 of the pile. I'm handing you what I've marked as 2 VIDEOGRAPHER: We're going off the record 3 Ferrell 6. at 4:38 p.m. 4 4 You won't recognize this, but I'll (A break was taken.) 5 5 represent to you that it is a document that VIDEOGRAPHER: Going back on the record at 6 LegalZoom produced to your attorneys that contains 6 4:46 p.m. 7 7 the information that was entered on the LegalZoom O. (By Mr. Wicks) Mr. Ferrell, you testified 8 8 a while ago that you believed that an LLC was not website by -- as you say, by Michelle. Flip to the 9 second page there. 9 legal if it was not created by a Missouri attorney. 10 Do you have a specific recollection of --10 Is that correct? 11 of a question coming up about state of formation and 11 A. Yes. 12 Michelle typing Missouri? 12 Q. Who told you that? 13 A. I don't recall. 13 MR. SIMERI: Objection. Assumes facts not 14 Q. Do you recall picking the LLC name 14 in evidence. 15 C&J Remodeling, LLC? 15 MR. WICKS: You can answer. 16 A. Yes. 16 MR. SIMERI: You can answer the question 17 Q. Do you recall entering your name, Chad 17 if you can. Ask him did someone tell him that, and 18 Michael Ferrell, and your address 160 Old then he can tell you. I don't know if someone did 18 19 Williamsburg Parkway? 19 tell him that. That was the point of my objection. A. Yes. 20 20 Q. (By Mr. Wicks) Can you answer the 21 Q. Let's drop down to the middle of the page 21 question? there. It says LLC is managed by, and do you 22 22 A. No, I can't. 23 23 remember Michelle entering by more than one manager? O. Did someone tell you that an LLC is not 24 24 A. I don't -- I don't recall. legal if the form is not created by a Missouri 25 Q. Do you -- do you think this was the 25 attorney? Page 45 Page 43 information that was entered on the LegalZoom 1 A. Can you repeat the question? I'm sorry. 2 2 website when you filled in the LLC form? MR. WICKS: Could you read it back? 3 3 A. Yeah. (The reporter read the last question.) 4 Q. Does it look familiar to you? 4 A. Yes, my lawyers. 5 5 A. Yeah, my name and address, state. MR. SIMERI: Well, I'm going to object to 6 Q. Now this is -- this is kind of a difficult 6 the extent that that's a privileged communication, 7 7 question, but I mean, do you -- have you looked although we didn't --8 through this -- and you can take as much time as you 8 MR. WICKS: We're not going to --9 9 MR. SIMERI: Of course, it wasn't really want. 10 necessarily what we said, but so be it. You're not 10 But do you think this reflects everything that you entered on the LegalZoom website? Do you a lawyer. You don't have to know that. Let's move 11 12 think you entered anything that isn't on here? 12 13 A. No. 13 Q. (By Mr. Wicks) All right. Anyone else? 14 14 Q. And this is -- this is the information 15 15 Q. All right. Now I know, Mr. Ferrell, you that was used to create the articles of organization 16 were working today and we scheduled the deposition 16 and articles of incorporation for your -- I'm sorry. for 3. And nobody's irritated that you were a 17 Strike that. 17 18 Is this the information, the information 18 little late, but you were half an hour late or so. 19 on Ferrell 4, that was used to create the 19 Right? 20 20 C&J Remodeling operating agreement and articles of MR. SIMERI: We had a mix up. We had 21 thought that it was 3:30, and then we saw the depo 21 organization? 22 notice and it said 3, so charge it to us because I 22 A. Yes. 23 MR. WICKS: I may be close to done. Can 23 told him 3:30. Q. (By Mr. Wicks) Okay. Okay. Were you 24 we take three or four minutes? 24 25 MR. SIMERI: Of course, yeah. 25 working until 3 or so?