

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

<b>TODD JANSON, et al.,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 10-04018-CV-C-NKL</b>
	)	
<b>LEGALZOOM.COM, INC.,</b>	)	
	)	
<b>Defendant.</b>	)	

**JOINT MOTION TO APPROVE STIPULATION**

The parties jointly submit the following motion to approve a stipulation between the parties as to the provision of class contact information:

1. On April 4, 2010, the Court issued an order in this case partially granting Plaintiffs' Motion for Approval of Class Notice and to Direct Defendants to Provide Class Contact Information. *See* Doc. 82. The Court set a deadline by which class notice must be distributed of 45 days from the date of the Order. That date is May 20, 2011.

2. The Court also read the language "to the present" in the class definition as running to the date notice is distributed and gave LegalZoom one week from the date of the Order to produce email and physical addresses for the remainder of class members. The parties seek the Court's approval of their agreement to the following procedure for complying with the Court's Order.

3. On Monday, April 4, 2011, as previously agreed between the parties, LegalZoom produced to Plaintiffs email and physical addresses for class members whose transactions took place from the beginning of the class period through and including March 1, 2011.

4. On May 13, 2011, LegalZoom will produce to Plaintiffs the most currently available email and physical addresses for class members whose transactions take place on and after March 2, 2011.

5. As soon as possible after May 20, 2011, LegalZoom will produce to Plaintiffs email and physical addresses for class members whose transactions take place after the data produced on May 13, through and including May 20, 2011.

6. No later than June 6, 2011, Plaintiffs will issue notice to those class members whose transactions took place following the data produced on May 13, through and including May 20, 2011.

WHEREFORE, the parties respectfully request that the Court approve the above stipulated schedule for production of email and physical addresses for members of the class.

Respectfully submitted,

**COOK, VETTER, DOERHOFF &  
LANDWEHR, PC**

By: /s/ Matthew A. Clement  
Timothy Van Ronzelen  
Matthew A. Clement  
Kari A. Schulte  
231 Madison  
Jefferson City, MO 65101

David T. Butsch  
James J. Simeri  
Mathew R. Fields  
BUTSCH SIMERI FIELDS LLC  
231 South Bemiston Ave., Suite 260  
Clayton, MO 63105

Edward D. Robertson, Jr.  
Mary Doerhoff Winter  
BARTIMUS, FRICKLETON, ROBERTSON  
& GORNY  
715 Swifts Highway  
Jefferson City, MO 65109

Randall O. Barnes  
RANDALL O. BARNES & ASSOCIATES  
219 East Dunklin Street, Suite A.  
Jefferson City, MO 65101

Steven E. Dyer  
10805 Sunset Office Drive, Suite 300  
St. Louis, MO 63127

ATTORNEYS FOR PLAINTIFFS

**BRYAN CAVE LLP**

By: /s/ James T. Wicks  
Robert M. Thompson MO #38156  
James T. Wicks MO #60409  
One Kansas City Place  
1200 Main Street, Suite 3500  
Kansas City, MO 64105  
Tel.: (816) 374-3200  
Fax: (816) 374-3300

Michael G. Biggers MO #24694  
James R. Wyrsh MO #53197  
One Metropolitan Square – Suite 3600  
211 North Broadway  
St. Louis, MO 63102  
Tel.: (314) 259-2000  
Fax: (314) 259-2020

ATTORNEYS FOR LEGALZOOM.COM,  
INC.

**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2011, I electronically filed the above and foregoing with the clerk of court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

s/ James T. Wicks