

KRONENBERGER BURGOYNE, LLP
150 Post Street, Suite 520
San Francisco, CA 94108
www.KBInternetLaw.com

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KRONENBERGER BURGOYNE, LLP
Karl S. Kronenberger (admitted *pro hac vice*)
150 Post Street, Suite 520
San Francisco, CA 94108
Telephone: (415) 955-1155
Facsimile: (415) 955-1158
karl@KBInternetLaw.com

Law Offices of Rasmussen & Kang
Dowon S. Kang (Bar No. 7042) (*Local Counsel*)
330 S. Third Street, Suite 1010
Las Vegas, Nevada 89101
Telephone: (702) 464-6007
Facsimile: (702) 464-6009
rasmussenkang@gmail.com

Attorneys for Plaintiff
INCORP SERVICES, INC.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

INCORP SERVICES, INC., a Nevada
corporation,

Plaintiff,

vs.

LEGALZOOM.COM, INC., a Delaware
corporation,

Defendant.

Case No. 2:09-cv-00273-RLH-LRL

**DECLARATION OF TENNIE
SEDLACEK IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT LEGALZOOM.COM,
INC.'S MOTION TO TRANSFER
VENUE**

1 I, Tennie Sedlacek, declare as follows:

2 1. I am the President of the Nevada corporation, Incorp Services, Inc.
3 (“Incorp”), a party in this action. As President, I have knowledge regarding Incorp’s
4 current and former employees, Incorp’s customer base, and Incorp’s day-to-day
5 operations. Unless otherwise stated, I have personal knowledge of the matters stated
6 herein.

7 2. Incorp is a corporation registered with the Nevada Secretary of State,
8 headquartered in Henderson, Nevada.

9 3. Incorp has about 45 employees, all of whom are located in Nevada.
10 Several of Incorp’s employees witnessed LegalZoom.com, Inc. (“LegalZoom”)’s
11 misconduct at issue in this lawsuit and/or witnessed the harm suffered by Incorp as a
12 result of LegalZoom’s misconduct. Incorp intends to call the following employees as
13 witnesses at trial to testify about these subjects:

- 14 a. Gayle Clauges, Director of Customer Service, located in Las Vegas,
15 Nevada;
- 16 b. Cecilia Padilla, Account Executive, located in Las Vegas, Nevada;
17 and
- 18 c. Marcus Moore, Account Executive, located in Las Vegas, Nevada.

19 4. Compelling roughly 7% of Incorp’s employees to travel to California for a
20 trial would greatly hinder Incorp’s ability to carry out its day-to-day operations and fulfill
21 its obligations to its customers.

22 5. Several third parties also witnessed LegalZoom’s misconduct. At this time,
23 Incorp intends to call the following third-parties as witnesses at trial to testify about the
24 false and defamatory statements made by LegalZoom about Incorp:

- 25 a. Doug Ansell, located in Las Vegas, Nevada; and
- 26 b. Anthony P. Schober, former customer of Incorp, located in Plano,
27 Texas.

28 6. Incorp has never had any employees in California, maintained an office in

1 California, or owned property in California.

2 I declare under penalty of perjury under the laws of the United States that the
3 foregoing is true and correct and that this Declaration was executed this 6th day of April,
4 2009, in Henderson, Nevada.

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6 _____
7 Tennie Sedlacek

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