

EXHIBIT B

1 Michael K. Dana (State Bar No. 019047)
2 Teresa K. Anderson (State Bar No. 024919)
3 SNELL & WILMER L.L.P.
4 One Arizona Center
5 400 E. Van Buren
6 Phoenix, AZ 85004-2202
7 Telephone: (602) 382-6000
8 Attorneys for and Robert Russo, QED Media Group, L.L.C.,
9 and Internet Defamation League, LLC

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF ARIZONA

XCENTRIC VENTURES, LLC, an Arizona
corporation, d/b/a
"RIPOFFREPORT.COM"; ED
MAGEDSON, an individual,

Plaintiff,

v.

WILLIAM "BILL" STANLEY, an
individual; WILLIAM "BILL" STANLEY
d/b/a DEFAMATION ACTION.COM;
WILLIAM "BILL" STANLEY d/b/a
COMPLAINTREMOVER.COM;
WILLIAM "BILL" STANLEY aka JIM
RICKSON; WILLIAM "BILL" STANLEY
aka MATT JOHNSON; ROBERT RUSSO,
an individual; ROBERT RUSSO d/b/a
COMPLAINTREMOVER.COM;
ROBERT RUSSO d/b/a
DEFENDMYNAME.COM; ROBERT
RUSSO d/b/a QED MEDIA GROUP,
L.L.C.; QED MEDIA GROUP, L.L.C.;
QED MEDIA GROUP, L.L.C. d/b/a
DEFENDMYNAME.COM; QED MEDIA
GROUP, L.L.C. d/b/a
COMPLAINTREMOVER.COM;
DEFAMATION ACTION LEAGUE, an
unincorporated association; and
INTERNET DEFAMATION LEAGUE, an
unincorporated association,

Defendants.

Case No. CV07-00954 PHX NVW

**AMENDED NOTICE OF
DEPOSITION - VIDEOTAPE**

1 ROBERT RUSSO, an individual; and QED
2 MEDIA GROUP, L.L.C.,

3 Counterclaimants,

4 v.

5 XCENTRIC VENTURES, LLC, an Arizona
6 corporation, d/b/a
7 "RIPOFFREPORT.COM"; ED
8 MAGEDSON, an individual,

9 Counterdefendants.

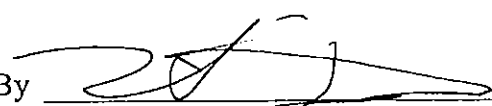
10 **YOU ARE HEREBY NOTIFIED** that, pursuant to Rules 26 and 30, Federal
11 Rules of Civil Procedure, the videotaped deposition of the person named below will be
12 taken upon oral examination at the time and place stated below before an officer
13 authorized by law to administer oaths.

14 **PERSON TO BE EXAMINED:** Ed Magedson
15 **DATE AND TIME OF DEPOSITION:** Wednesday, August 22, 2007
16 at 9:00 a.m.
17 **PLACE OF DEPOSITION:** SNELL & WILMER, L.L.P.
18 19th Floor
19 One Arizona Center
20 400 E. Van Buren
21 Phoenix, Arizona 85004-2202

22 DATED this 11th day of July, 2007.

23 SNELL & WILMER L.L.P.

24 By


25 Michael K. Dana
26 Teresa K. Anderson
27 One Arizona Center
28 400 E. Van Buren
Phoenix, AZ 85004-2202
Attorneys for and Robert Russo, QED Media Group,
L.L.C., and Internet Defamation League, LLC

///

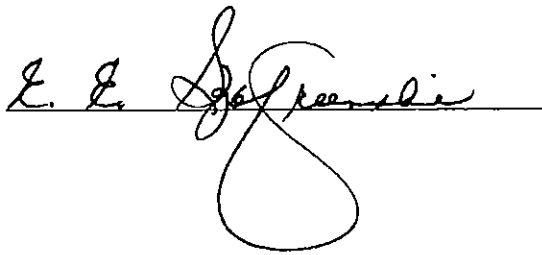
///

1 ORIGINAL and ONE COPY
2 of the foregoing mailed and emailed
3 this 11th day of July, 2007 to:

3 Maria Crimi Speth
4 JABURG & WILK, P.C.
5 3200 North Central Avenue, Suite 200
6 Phoenix, AZ 85012
7 *Attorneys for Plaintiff*
8 mcs@jaburgwilk.com

6 COPY of the foregoing emailed this
7 11th day of July, 2007 to:

8 William A McNutt III
9 COPPERSTATE REPORTING SERVICE
10 12601 N. 59th Place, Suite 100
11 Scottsdale, AZ 85254
12 bill@copperstate.phxcoxmail.com

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Snell & Wilmer
L.L.P.
LAW OFFICES
One Arizona Center, 400 E. Van Buren
Phoenix, Arizona 85004-2202
(602) 382-6000

1 Michael K. Dana (State Bar No. 019047)
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Phoenix, AZ 85004-2202
4 Telephone: (602) 382-6000
Attorneys for and Robert Russo, QED Media Group, L.L.C.,
5 and Internet Defamation League, LLC

6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE DISTRICT OF ARIZONA

8 XCENTRIC VENTURES, LLC, an Arizona
corporation, d/b/a
9 "RIPOFFREPORT.COM"; ED
MAGEDSON, an individual,

Case No. CV07-00954 PHX NVW

10 Plaintiff,

**AMENDED NOTICE OF RULE
30(b)(6) DEPOSITION OF
XCENTRIC VENTURES, LLC -
VIDEOTAPED**

11 v.

12 WILLIAM "BILL" STANLEY, an
13 individual; WILLIAM "BILL" STANLEY
d/b/a DEFAMATION ACTION.COM;
14 WILLIAM "BILL" STANLEY d/b/a
COMPLAINTREMOVER.COM;
15 WILLIAM "BILL" STANLEY aka JIM
RICKSON; WILLIAM "BILL" STANLEY
16 aka MATT JOHNSON; ROBERT RUSSO,
an individual; ROBERT RUSSO d/b/a
17 COMPLAINTREMOVER.COM;
ROBERT RUSSO d/b/a
18 DEFENDMYNAME.COM; ROBERT
RUSSO d/b/a QED MEDIA GROUP,
19 L.L.C.; QED MEDIA GROUP, L.L.C.;
QED MEDIA GROUP, L.L.C. d/b/a
20 DEFENDMYNAME.COM; QED MEDIA
GROUP, L.L.C. d/b/a
21 COMPLAINTREMOVER.COM;
DEFAMATION ACTION LEAGUE, an
22 unincorporated association; and
INTERNET DEFAMATION LEAGUE, an
23 unincorporated association,

24 Defendants.

1 ROBERT RUSSO, an individual; and QED
2 MEDIA GROUP, L.L.C.,

3 Counterclaimants,

4 v.

5 XCENTRIC VENTURES, LLC, an Arizona
6 corporation, d/b/a
"RIPOFFREPORT.COM"; ED
7 MAGEDSON, an individual,

8 Counterdefendants.

9 **TO: XCENTRIC VENTURES, LLC AND THEIR ATTORNEY OF RECORD:**

10 YOU ARE HEREBY NOTIFIED that, pursuant to Rules 26 and 30(b)(6), Federal
11 Rules of Civil Procedure you are hereby requested to designate and produce for
12 deposition an officer, director or managing agent, or such other person who consents to
13 testify on your behalf, to testify as to matters known by or reasonably available to you
14 with respect to the following subjects:

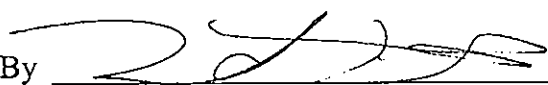
- 15 1. The factual support for the allegations in your May 10, 2007 Verified
16 Complaint.
- 17 2. The management and operation of Xcentric Ventures.
- 18 3. The creation, performance, and termination of contracts with your internet
19 service providers, web hosts, internet service companies, advertisers and
20 customers.
- 21 4. Business operations and policies regarding the publication of information
22 on the "Rip-Off Report" website.
- 23 5. Communications by any of the defendants in this case with any of your
24 internet service providers, web hosts, internet service companies,
25 advertisers, and customers.
- 26 6. Communications between Xcentric and any defendants.

27 The videotaped deposition will be taken upon oral examination before a Notary
28 Public, or some other official authorized by law to administer oaths, commencing at 9:00

1 a.m. on Friday, August 24, 2007, at the offices of Snell & Wilmer, One Arizona Center,
2 Phoenix, Arizona. The oral examination will continue from day to day thereafter on
3 successive business days until completed. You are invited to attend and cross-examine.

4 DATED this 11th day of July, 2007.

5 SNELL & WILMER LLP.

6
7 By 

8 Michael K. Dana
9 Teresa K. Anderson
10 One Arizona Center
11 400 E. Van Buren
12 Phoenix, AZ 85004-2202
13 Attorneys for and Robert Russo, QED Media Group,
14 L.L.C., and Internet Defamation League, LLC

12 **ORIGINAL and ONE COPY**
13 of the foregoing mailed and copy emailed
14 this 11th day of July, 2007 to:

14 Maria Crimi Speth
15 JABURG & WILK, P.C.
16 3200 North Central Avenue, Suite 200
17 Phoenix, AZ 85012
18 *Attorneys for Plaintiff*
19 mcs@jaburgwilk.com

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18 11th day of July, 2007 to:

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22 Scottsdale, AZ 85254
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22 