



Lisa Borodkin <lborodkin@gmail.com>

AEI x. Xcentric: Request to Meet re Plaintiffs Discovery Responses

Lisa Borodkin <lborodkin@gmail.com>

Fri, May 28, 2010 at 11:34 AM

To: "<david@ripoffreport.com>" <david@ripoffreport.com>, Maria Crimi Speth <mcs@jaburgwilk.com>

Cc: Daniel Blackert <blackertesq@yahoo.com>, alexandra@asiaecon.org, kristi@asiaecon.org

Hi David,

We can meet and confer Tuesday. Please suggest a time.

We have been getting some documents ready to send you but if you would like to come inspect and make copies yourself you are welcome to do so, subject to our objection that your requests were premature. The documents are at AEI's office.

I am not sure as a matter of law that you will get an order on those requests if you bring a motion to compel. I actually think your requests may be void because you served them before the Rule 26(f) conference. But I'd rather spend the time getting you documents.

We are also very concerned that the RipoffReport.com website seems to be changing. We are concerned electronic evidence may be destroyed. I would like a statement as to what you have done to preserve ESI in this case, and to confer on that.

Lisa

On May 27, 2010, at 5:05 PM, "David Gingras" <david@ripoffreport.com> wrote:

Dan & Lisa,

Please review the attached letter and respond as soon as possible.

David Gingras, Esq.

General Counsel

Xcentric Ventures, LLC

<http://www.ripoffreport.com/>David@RipoffReport.com

<image001.jpg>

PO BOX 310, Tempe, AZ 85280

Tel.: (480) 668-3623

Fax: (480) 248-8326

|

| <Ltr - Dan & Lisa - 5-27-2010.pdf>
