



Lisa Borodkin <lborodkin@gmail.com>

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

Lisa Borodkin <lborodkin@gmail.com>

Sat, May 29, 2010 at 2:44 PM

To: "<david@ripoffreport.com>" <david@ripoffreport.com>

Cc: Maria Crimi Speth <mcs@jaburgwilk.com>, Daniel Blackert <blackertesq@yahoo.com>

Thanks. How about noon on Tuesday?

Also, please give us your statement on ESI. The website is on and off. We need to know what backup tapes, disks, recovery, and otherwise overwriting precautions you are taking to preserve data.

I'd prefer not to do this, but we may need to apply ex parte for a TRO if we cannot confirm a statement from you regarding preservation of ESI.

Lisa

On May 29, 2010, at 10:38 AM, "David Gingras" <david@ripoffreport.com> wrote:

Lisa,

I don't think the court will appreciate any party making clever (and disingenuous) technical arguments to avoid having to provide crucial discovery especially given your previous representations to the court about being ready to proceed immediately, but we can discuss this further when we meet and confer on Tuesday.

Having said this, and without agreeing that I am under any obligation to do so, I'm re-serving our discovery requests which are attached (note – some changes have been made). Depending on various factors, I may or may not still move forward with a motion to compel, but while that issue is being decided, you can go ahead and provide full and complete answers to these new requests by June 29th.

David Gingras, Esq.

General Counsel

Xcentric Ventures, LLC

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| <AEI v. Xcentric - Defendants' FIRST Re-Served Discovery.pdf>
