

Lisa Borodkin < lborodkin@gmail.com>

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

David Gingras <david@ripoffreport.com>

Sun, May 30, 2010 at 7:02 PM

Reply-To: david@ripoffreport.com

To: Lisa Borodkin < lborodkin@gmail.com>

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

Lisa,

You have requested no discovery from us relating to ESI or anything else, and you've indicated that you don't intend to so do. As such, I have no clue what ESI you want us to locate, preserve, or to provide you with a report about.

As we have told you from the beginning of the case, original author submissions are always preserved and are never changed. This is true of the reports about AEI, so your perception of an emergency is mistaken. As is true of virtually any website, peripheral parts of the site are always being reviewed and upgraded, so perhaps you're confused by some cosmetic and other change. However, as I understand it, your case is not based on any of these aspects of the site so I don't think this is a real concern.

If you would like to begin providing us with some additional information about your theory of the case, it's possible that we might begin to understand why ESI you feel is relevant, but at this point I see zero substantive purpose to your email below.

David Gingras, Esq.

General Counsel

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From: Lisa Borodkin [mailto:lborodkin@gmail.com]

Sent: Saturday, May 29, 2010 2:44 PM

To: < david@ripoffreport.com>

Cc: Maria Crimi Speth; Daniel Blackert



Lisa Borodkin < lborodkin@gmail.com>

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

Lisa Borodkin lborodkin@gmail.com

Sun, May 30, 2010 at 7:25 PM

To: david@ripoffreport.com

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

Metatags and HTML source for the reports at issue in the litigation. Please let me know if you want to confer on Tuesday at noon.

Lisa

[Quoted text hidden]

7/29/2010 5:48 PM