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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

ASIA ECONOMIC INSTITUTE, a  
California LLC; RAYMOND  
MOBREZ an individual; and ILIANA  
LLANERAS, an individual,

Plaintiffs,

vs.

XCENTRIC VENTURES, LLC, an  
Arizona LLC, d/b/a as BADBUSINESS  
BUREAU and/or  
BADBUSINESSBUREAU.COM  
and/or RIP OFF REPORT and/or  
RIPOFFREPORT.COM; BAD  
BUSINESS BUREAU, LLC, organized  
and existing under the laws of St.  
Kitts/Nevis, West Indies; EDWARD  
MAGEDSON an individual, and DOES  
1 through 100, inclusive,

Defendants.

Case No.: 2:10-cv-01360-SVW-PJW

**[PROPOSED] ORDER GRANTING  
PLAINTIFFS' *EX PARTE*  
APPLICATION FOR TEMPORARY  
RESTRAINING ORDER  
REGARDING (1) THE  
PRESERVATION OF  
ELECTRONICALLY STORED  
INFORMATION ("ESI") AND (2)  
FOR PROTECTIVE ORDER  
PREVENTING INTERFERENCE  
WITH WITNESSES**

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Plaintiffs moved *ex parte* under Federal Rule of Civil Procedure 26 for an  
Order requiring Defendants to:

(a) refrain from irrevocably overwriting the SQL server and databases for  
the website hosted at Ripoffreport.com (the "Website") and to create back-ups to  
preserve the HTML and electronic data relating to the 58 web pages identified in

1 the pleadings and any other potentially discoverable electronically stored  
2 information (“ESI”);

3 (b) provide a statement under oath as to the steps they have taken  
4 reasonable steps to preserve relevant ESI from the inception of this litigation on  
5 January 28, 2009; and

6 (c) insert the meta tag <meta name-“Robots”  
7 content=”noindex,nofollow”> into the HTML for the 5 web pages concerning  
8 plaintiffs pending the outcome of this litigation.

9 In addition, Plaintiffs moved *ex parte* for a protective order under Federal  
10 Rule of Civil Procedure 26(c) ordering Defendants and Defendants’ counsel to  
11 refrain from improperly interfering with any witness for the purpose of gaining an  
12 advantage in this action.

13 After considering the moving and opposition papers, arguments of counsel  
14 and all other matters presented to the Court, IT IS HEREBY ORDERED THAT  
15 the motion is GRANTED.

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17 DATED:

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19 /s/  
20 \_\_\_\_\_  
21 United States District Judge /  
22 U.S. Magistrate Judge  
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