DANIEL F. BLACKERT, ESQ., CSB No. 255021 LISA J. BORODKIN, ESQ., CSB No. 196412 2 **Asia Economic Institute** 11766 Wilshire Blvd., Suite 260 Los Angeles, CA 90025 Telephone (310) 806-3000 Facsimile (310) 826-4448 3 4 Daniel@asiaecon.org 5 Blackertesq@yahoo.com lisa borodkin@post.harvard.edu 6 Attorneys for Plaintiffs, 7 Asia Economic Instituté, LLC Raymond Mobrez, and 8 Iliana Llaneras 9 UNITED STATES DISTRICT COURT 10 CENTRAL DISTRICT OF CALIFORNIA 11 ASIA ECONOMIC INSTITUTE, a California LLC; RAYMOND Case No.: 2:10-cv-01360-SVW-PJW 12 The Honorable Steven V. Wilson MOBREZ an individual; and ILIANA 13 LLANERAS, an individual, NOTICE OF LODGING OF 14 [PROPOSED] SECOND AMENDED Plaintiffs, COMPLAINT 15 VS. [FILED CONCURRENTLY WITH PLAINTIFFS' MOTION FOR LEAVE TO AMEND PLAINTIFFS' 16 XCENTRIC VENTURES, LLC, an Arizona LLC, d/b/a as BADBUSINESS 17 FIRST AMENDED COMPLAINT BUREAU and/or BADBUSINESSBUREAU.COM 18 Date: September 20, 2010 and/or RIP OFF REPORT and/or Time: 1:30 p.m. 19 RIPOFFREPORT.COM; BAD Courtroom: 6 BUSINESS BUREAU, LLC, organized 20 and existing under the laws of St. Kitts/Nevis, West Indies; EDWARD 21 MAGEDSON an individual, and DOES 1 through 100, inclusive, 22 Defendants. 23 2.4 25 26 27 28

Plaintiffs' Ex Parte Motion under Rule 56(f) and for Sanctions

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## TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:

PLEASE TAKE NOTICE that pursuant to Local Civil Rule 15-1 Plaintiffs hereby lodge the attached [Proposed] Second Amended Complaint in Connection with Plaintiff's Motion for Leave to Amend the First Amended Complaint.

The Motion is being filed concurrently herewith. The attached [Proposed] Second Amended Complaint is lodged without exhibits for purposes of the Motion. However, the exhibits are identical to those filed with the First Amended Complaint. If the Motion is granted, Plaintiffs will file the Second Amended Complaint with a full set of exhibits and as a manual paper filing in accordance with Local Rules 15-2 and 15-4.

DATED: August 16, 2010

/s/ Daniel F. Blackert

DANIEL F. BLACKERT

LISA J. BORODKIN

Attorneys for Plaintiffs,

Asia Economic Institute LLC,

Raymond Mobrez, and Iliana Llaneras