

1 David S. Gingras, CSB #218793  
**Gingras Law Office, PLLC**  
 2 4072 E Mountain Vista Dr.  
 Phoenix, AZ 85048  
 3 Tel.: (480) 668-3623  
 Fax: (480) 248-3196  
 4 David.Gingras@webmail.azbar.org

5 Maria Crimi Speth, (Admitted *Pro Hac Vice*)  
**Jaburg & Wilk, P.C.**  
 6 3200 N. Central Ave., Suite 2000  
 Phoenix, AZ 85012  
 7 Tel: (602) 248-1000  
 Fax: (602) 248-0522  
 8 mcs@jaburgwilk.com

9 Attorneys for Defendants  
 Xcentric Ventures, LLC and  
 10 Edward Magedson

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

GINGRAS LAW OFFICE, PLLC  
 4072 EAST MOUNTAIN VISTA DRIVE  
 PHOENIX, ARIZONA 85048

15 **ASIA ECONOMIC INSTITUTE, LLC, et al.,**  
 16 **Plaintiffs,**  
 17 **vs.**  
 18 **XCENTRIC VENTURES, LLC, et al.,**  
 19 **Defendants.**

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

**DECLARATION OF  
 KIM JORDAN IN SUPPORT OF  
 DEFENDANTS' MOTION FOR  
 SUMMARY JUDGMENT**

Hearing Date: Nov. 1, 2010  
 Time: 1:30 PM  
 Courtroom: 6 (Hon. Stephen Wilson)

Complaint Filed: Jan. 27, 2010

1 I, KIM JORDAN, hereby declare as follows:

2 1. My name is Kim Jordan. I am a resident of the State of Arizona, am over  
3 the age of 18 years, and if called to testify in court in this matter I could and would  
4 truthfully testify to the following facts based upon my own personal knowledge.

5 2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric")  
6 as a content monitor. I have worked for Xcentric in this position since the spring of  
7 2006.

8 3. In my job as a content monitor, I am responsible for reviewing new  
9 postings that are submitted to the website [www.RipoffReport.com](http://www.RipoffReport.com) ("Rip-Off Report").

10 4. My job is to remove the following information from new postings: personal  
11 financial information, credit card numbers, bank account numbers, social security  
12 numbers, obscenities, and threats of violence.

13 5. Except as described in the previous paragraph, I am not permitted to, nor do  
14 I, change or add any content to (1) any posting; (2) any title or heading of any posting;  
15 and/or (3) any other part of the Rip-off Report website.

16 6. I am aware that a lawsuit has been filed against Xcentric and others in  
17 which relates to the following Reports: 417493, 423987, 457433, 502429, 564331 and  
18 571232. I understand that according to Xcentric's records, I was the content monitor  
19 who reviewed one or more of these reports before they were posted to the site.

20 7. I have personally reviewed each of these reports and I know that I did not  
21 create or alter any part of them, nor do I have any information that such reports may have  
22 been created or altered by another employee or agent of Xcentric.

23 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the  
24 United States of America that the foregoing is true and correct.

25 DATED: MAY 21 2010.

26   
27 KIM JORDAN  
28

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on September 27, 2010 I electronically transmitted the attached  
3 document to the Clerk’s Office using the CM/ECF System for filing, and for transmittal  
4 of a Notice of Electronic Filing to the following CM/ECF registrants:  
5

6 Mr. Daniel F. Blackert, Esq.  
7 Ms. Lisa J. Borodkin, Esq.  
8 Asia Economic Institute  
9 11766 Wilshire Blvd., Suite 260  
10 Los Angeles, CA 90025  
11 Attorneys for Plaintiffs

12 And a courtesy copy of the foregoing delivered to:  
13 Honorable Stephen V. Wilson  
14 U.S. District Judge

15 /s/David S. Gingras  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

GINGRAS LAW OFFICE, PLLC  
4072 EAST MOUNTAIN VISTA DRIVE  
PHOENIX, ARIZONA 85048