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 Asia Economic Institute LLC,  
 Raymond Mobrez, and  
 Iliana Llaneras

**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

The Honorable Stephen V. Wilson

**DECLARATION OF LISA J.  
 BORODKIN IN OPPOSITION TO  
 MOTION FOR SUMMARY  
 JUDGMENT**

Date: November 1, 2010

Time: 1:30 p.m.

Courtroom: 6

1  
2 I, Lisa J. Borodkin, declare:

3 1. I am an attorney at law, duly admitted to practice before all the courts  
4 of the State of California and this Honorable Court. I am co-counsel of record for  
5 Plaintiffs Asia Economic Institute LLC, Raymond Mobrez and Iliana Llaneras  
6 (“Plaintiffs”) in this action. I have first-hand, personal knowledge of the facts  
7 below and if called as a witness I could and would testify competently thereto.

8 2. On June 2, 2010 Plaintiffs took the 30(b)(6) deposition of Defendant  
9 Xcentric Ventures LLC (“Xcentric”). Xcentric produced Defendant Edward  
10 Magedson as their 30(b)(6) deponent. I personally attended the deposition.  
11 Attached hereto as **Exhibit “1”** is a true and correct copy of the official transcript  
12 of the June 2, 2010 30(b)(6) deposition of Xcentric.

13 3. On June 8, 2010, Plaintiffs took the deposition of Defendant Edward  
14 Magedson. I personally attended the deposition. Attached hereto as Exhibit “2” is  
15 a true and correct copy of the official transcript of the June 8, 2010 transcript of the  
16 deposition of Edward Magedson.

17 4. On August 6, 2010, Plaintiffs applied for an order of preservation  
18 regarding the preservation of Electronically Stored Information (“ESI”) by  
19 Defendants and other relief. Attached hereto as **Exhibit “3”** is a true and correct  
20 copy of the transcript of the telephonic proceedings before the Honorable Patrick J.  
21 Walsh on Plaintiffs’ Application for an order of preservation of ESI and other  
22 relief.

23 I declare under penalty of perjury under the laws of the State of California  
24 and the United States of America that the foregoing is true and correct.

25 Executed this 5th day of October, 2010, in Los Angeles, California.

26 /s/ Lisa J. Borodkin  
27 Lisa J. Borodkin  
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