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 14 Attorneys for Defendants  
 Xcentric Ventures, LLC and  
 Edward Magedson

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

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 19 **ASIA ECONOMIC INSTITUTE, LLC, *et al.*,**

20 **Plaintiffs,**

21 **vs.**

22 **XCENTRIC VENTURES, LLC, *et al.*,**

23 **Defendants.**

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

**DECLARATION OF  
 LYNDA CRAVEN IN SUPPORT  
 OF DEFENDANTS' MOTION  
 FOR SUMMARY JUDGMENT**

Hearing Date: June 28, 2010  
 Time: 1:30 PM  
 Courtroom: 6 (Hon. Stephen Wilson)

Complaint Filed: Jan. 27, 2010

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**DECLARATION OF LYNDA CRAVEN**

CV10-01360 SVW

Dockets.Justia.com

1 I, LYNDA CRAVEN hereby declare as follows:

2 1. My name is Lynda Craven. 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 summer of  
7 2003.

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 ("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.

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27 \_\_\_\_\_  
28 LYNDA CRAVEN

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 24, 2010 I electronically transmitted the attached document  
3 to the Clerk’s Office using the CM/ECF System for filing, and for transmittal of a Notice  
4 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  
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