DANIEL F. BLACKERT, CSB No. 255021 LISA J. BORODKIN, CSB No. 196412 **Asia Economic Institute LLC** 11766 Wilshire Boulevard Suite 260 Los Angeles, California 90025 1 2 3 Telephone (310) 806-3000/Facsimile (310) 826-4448
Blackertesq@yahoo.com 4 lisa borodkin@post.harvard.edu 5 Attorneys for Plaintiffs, 6 7 UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA 8 Case No.: 2:10-cv-01360-SVW-PJW 9 ASIA ECONOMIC INSTITUTE, a California LLC; RAYMOND 10 MOBREZ an individual; and ILIANA The Honorable Stephen V. Wilson LLANERAS, an individual, 11 **DECLARATION OF LISA J.** Plaintiffs, BORODKIN IN OPPOSITION TO 12 **DEFENDANTS' MOTION FOR** VS. 13 SUMMARY JUDGMENT XCENTRIC VENTURES, LLC, an 14 Arizona LLC, d/b/a as BADBUSINESS June 28, 2010 Date: BUREAU and/or 15 Time: 1:30 p.m. BADBUSINESSBUREAU.COM Ctrm: and/or RIP OFF REPORT and/or 16 RIPOFFREPORT.COM; BAD BUSINESS BUREAU, LLC, organized 17 Discovery Cut-off: None Set and existing under the laws of St. Pretrial Conf. Date: August 2, 2010 Kitts/Nevis, West Indies; EDWARD 18 Trial Date: August 3, 2010 MAGEDSON an individual, and DOES 19 1 through 100, inclusive, 20 Defendants. 21 22 23 24 25 26 27 28

DECLARATION OF LISA J. BORODKIN

I, Lisa J. Borodkin, declare:

- 1. I am an attorney at law, duly admitted to practice before all the courts of the State of California and this Honorable Court. I am co-counsel of record for Plaintiffs Asia Economic Institute LLC, Raymond Mobrez and Iliana Llaneras ("Plaintiffs") in this action. I have first-hand, personal knowledge of the facts set forth below and, if called as a witness, I could and would testify competently thereto.
- 2. This Declaration is made in opposition to Defendants' Motion for Summary Judgment.
- 3. Attached hereto as **Exhibit "1"** is a true and correct copy of the Initial Rule 26 Disclosures of Defendants Xcentric Ventures LLC and Edward Magedson and covering email dated April 21, 2010.
- 4. Defendants have not supplemented their Initial Disclosures between April 21, 2010 and today.
- 5. Attached hereto as **Exhibit "2"** is a true and correct copy of Plaintiffs' May 14, 2010 Notice of Deposition under Rule 30(b)(6) of Defendant Xcentric Ventures LLC.
- 6. On June 2, 2010, Plaintiffs took the Deposition under Rule 30(b)(6) of Defendant Xcentric Ventures LLC of certain topics, including "Xcentric's practice of recording telephone conversations." I attended and appeared for Plaintiffs for the entire June 2, 2010 deposition of Xcentric Ventures. Attached hereto as **Exhibit "3"** are true and correct copies of pages 70 and 71 from the rough draft of the transcript of the June 2, 2010 deposition.
- 7. On June 8, 2010, Plaintiffs took the Deposition of Defendant Edward Magedson. Attached hereto as **Exhibit "4"** are true and correct copies of pages 125-129 from the rough deposition transcript of the June 8, 2010 deposition of Mr. Magedson.

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	8.	Attached hereto as Exhibit "5" is a true and correct copy of
page 200	from the	e rough deposition transcript of the June 8, 2010 deposition of
Mr. Mage	edson.	

- 9. Attached hereto as **Exhibit "6"** are true and correct copies of pages 12-17 from the rough deposition transcript of the June 8, 2010 deposition of Mr. Magedson.
- 10. Attached hereto as **Exhibit "7"** are true and correct copies of pages 100-04 from the rough deposition transcript of the June 8, 2010 deposition of Mr. Magedson.
- 11. Attached hereto as **Exhibit "8"** are true and correct copies of pages 211-12 from the rough deposition transcript of the June 8, 2010 deposition of Mr. Magedson.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed this 14th day of June, 2010, in Los Angeles, California.

/s/ Lisa J. Borodkin Lisa J. Borodkin

CERTIFICATE OF SERVICE

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I certify that on June 14, 2010 I electronically transmitted the attached document: **DECLARATION OF LISA J. BORODKIN IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT** to the **Clerk's Office using the CM/ECF** system for filing, and for transmittal of a **Notice of Electronic Filing, to the following CM/ECF registrants:**

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Honorable Stephen V. Wilson

U.S. District Judge

/s/Lisa J. Borodkin