1 2 3 4 5 6 7 8 9	DANIEL F. BLACKERT CSB No. 2550 LISA J. BORODKIN CSB No. 196412  Asia Economic Institute 11766 Wilshire Blvd., Suite 260 Los Angeles, CA 90025 Telephone (310) 806-3000 Facsimile (310) 826-4448  Daniel arasiaecon.org Blackertese a vanoo.com ISB L. dsiaecon.org lisa_borodkin@post.harvard.edu  Attorneys for Plaintiffs, Asia Economic Institute LLC, Raymond Mobrez, and Iliana Llaneras	21
10	UNITED STATES DISTRICT COURT	
11	CENTRAL DISTRICT OF CALIFORNIA	
12 13 14 15 16 Asia Econor 18 19 20 21 22 23 24 25	ASIA ECONOMIC INSTITUTE LLC, a California LLC, RAYMOND MOBREZ an individual, and ILIANA LLANERAS, an individual,  Plaintiffs,  vs.  XCENTRIC VENTURES LLC, and Arizona LLC, d/b/a as BADBUSINESS BUREAU and/or BADBUSINESS BUREAU 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.	ASIA ECONOMIC INSTITUTE'S NOTICE OF DEPOSITION TO DEFENDANT XCENTRIC VENTURES, LLC UNDER F.R.C.P. 30(b)(6)  The Hon. Stephen V. Wilson Pretrial Conference: August 2, 2010 Trial Date: August 3, 2010  Deposition Date: May 27, 2010 Time: 9:00 a.m. Place: Jaburg & Wilk 3200 N. Central Ave. Suite 2000 Phoenix, AZ 85012
26 27 28		
	Notice of 30(b)(6) Deposition of Xcentric Ventures LLC 1360  10-cv-	

Doc. 63 Att. 2

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Plaintiff Asia Economic Institute, LLC ("AEI"), by and through its attorneys, will take the deposition of Defendant Xcentric Ventures, LLC ("Xcentric") upon oral examination at 9:00 a.m. on May 27, 2010 at the offices of Jaburg & Wilk, 3200 N. Central Avenue, Suite 2000, Phoenix, Arizona 85012, or at such place as the parties shall reasonably mutually determine. The deposition will be videotaped and recorded stenographically before a certified shorthand reporter duly authorized to administer oaths.

The designee(s) will be examined on these topics:

- 1. Xcentric's conversations with Plaintiffs.
- 2. The operation and management of the Corporate Advocacy Program ("CAP").
- 3. The persons who negotiate, set, or otherwise establish the cost of joining and/or maintaining participation in CAP.
- 4. Xcentric's method of establishing the cost of CAP for its participants.
- 5. Persons working for or on behalf of Xcentric or in partnership with Xecentric to solicit participants in CAP.
- 6. Xcentric's methods of soliciting participants in CAP.
- 7. Third parties hired, engaged or known by Xcentric to solicit participants in CAP.
- 8. Xcentric's practice of recording telephone conversations.
- 9. Xcentric's vendor for recording telephone conversations.

DATED: May 14, 2010

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Daniel F. Blackert Lisa J. Borodkin

Attorneys for Plaintiffs

Asia Economic Institute LLC, Raymond Mobrez and Iliana

Llaneras

## CERTIFICATE OF SERVICE

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I hereby certify that on May 14, 2010 I emailed the foregoing to:

David S. Gingras

Gingras Law Office, PLLC

4073 E. Mountain Vista Drive

Phoenix, AZ 85048

Attorney for Defendants

With a copy to follow by United States First Class mail.

Lisá J. Borodkin