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8 Attorney for Plaintiffs,
9 Asia Economic Institute, LLC,
Raymond Mobrez, and
10 Iliana Llaneras

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

13 ASIA ECONOMIC INSTITUTE, a
California LLC; RAYMOND
14 MOBREZ an individual; and ILIANA
LLANERAS, an individual,

15
16 Plaintiffs,

17 vs.

18 XCENTRIC VENTURES, LLC, an
Arizona LLC, d/b/a as BADBUSINESS
19 BUREAU and/or
BADBUSINESSBUREAU.COM
20 and/or RIP OFF REPORT and/or
RIPOFFREPORT.COM; BAD
21 BUSINESS BUREAU, LLC, organized
and existing under the laws of St.
22 Kitts/Nevis, West Indies; EDWARD
MAGEDSON an individual, and DOES
23 1 through 100, inclusive,

24 Defendants.
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Case No.: 2:10-cv-01360-SVW-PJW

**NOTICE OF ERRATA
REGARDING THE
DECLARATION OF DANIEL F.
BLACKERT, ESQ. IN
OPPOSITION TO DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT**

1
2 Plaintiffs hereby notify this Court of errata.

3 **EXHIBIT 33** to the **DECLARATION OF DANIEL F. BLACKERT,**
4 **ESQ. IN OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY**
5 **JUDGMENT** was inadvertently excluded.

6 To correct this errata, Plaintiffs have attached **EXHIBIT 33** to this
7 document as **EXHIBIT A.**

8
9 RESPECTFULLY SUBMITTED this 15th day of JUNE, 2010

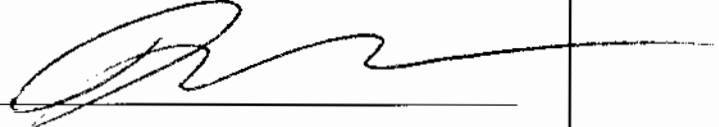
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11 
12 _____
13 DANIEL F. BLACKERT, ESQ.
14 LISA J. BORODKIN, ESQ.
15 Attorneys for Plaintiffs
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EXHIBIT A

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*** UNEDITED UNCERTIFIED TEXT ***

e-mail that begins, I am in California. I live here now. Why don't you read that over.

A. You want me to repeat what you just said?

Q. No, you can just read it over yourself.

A. Okay.

Q. In your e-mail, what do you mean -- in Excentric's e-mail, what do you mean by there is nothing that you can do to help my client, you meaning Excentric?

A. Probably he was asking me to remove complaints or I have to look at what the previous e-mail was. You know, he could file a rebuttal. That's what I'm essentially telling him. And, you know, he's asking about a meeting where he talks about -- just what's your question, exactly?

Q. My question is, what do you mean by -- what does Excentric mean by there is nothing they can do to help my client?

A. There is nothing I can do other than him filing a rebuttal.

Q. Is it true that you -- Excentric has never lost a case?

A. Correct.

Q. A legal case?

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*** UNEDITED UNCERTIFIED TEXT ***

A. Correct.

Q. So Excentric has never lost a legal case?

A. We can lose a motion, but we have never lost a case.

Q. Have you settled any cases?

A. Sure.

MR. GINGRAS: Objection. Form and beyond scope of the 30(b)6.

Q. BY MR. BLACKERT: Okay. And it's your practice not to remove posts?

A. Correct.

Q. Have you ever removed posts in the past?

A. We don't have a practice of removing posts.

Q. Okay. Now, when an aggrieved party meaning someone who has filed a -- someone -- strike that. When someone has rip off report filed against them, and they want to ascertain the identity of the posters, how do they go through Excentric to do that?

MR. GINGRAS: Objection. Beyond the scope of the 30(b)6.

You can answer if you want to and if you know the answer.

THE WITNESS: I think it's called Mobrez.

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*** UNEDITED UNCERTIFIED TEXT ***

MR. GINGRAS: Mobilisa.

THE WITNESS: Mobilisa. Okay. They have to comply with Mobilisa. I forget. I can't pronounce it.

Q. BY MR. BLACKERT: Are you referring to like a subpoena?

A. No. What they need to do is they can put a notice -- file a rebuttal. They have to put a notice. It's a law, it's an actual law, if they want, and there is certain steps that they would have to go through. Whether or not they would end up getting it or not, it depends.

Q. Can you explain to me what those steps are that they have to go through?

MR. GINGRAS: Objection. Calls for a legal conclusion.

THE WITNESS: Yeah, I'm not a lawyer. You can look it up. You know, I'll mix it up, and I'll probably get some things wrong, so I'm best off not explaining it.

Q. BY MR. BLACKERT: If Excentric gets a subpoena to reveal these names, do you usually -- does Excentric comply with these subpoenas?

MR. GINGRAS: Objection. Calls for a legal conclusion and beyond scope of the 30(b)6.

A. It is something the attorneys deal with, so I

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A. Add to what?

Q. Add to your previous answer?

A. I don't know.

Q. About the benefits of the CAP program?

A. What would you like to know.

Q. The benefits of the CAP program other than what you have testified to today, any other benefits that you can think of.

A. I forgot where I left off before. But there's a perceived value, just like a perceived value to the consumer with the BBB, which is a great way to give it as an example. So rip off report is prominent. Consumers see that there are all these other complaints usually about a business, and the same thing with AA's your economic. There is other complaint sites, and when it is there and it's on rip off report investigation, negative stuff is still there, but, hey, XYZ company decided and realized that they can have made changes, they made changes, and they always urge a business once they join the program, you are best off admitting, hey, we might have made some mistakes. It always looks go to the customer to admit, hey, we might have made some mistakes. These are the changes we made to avoid them in the future.