

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA

3 ASIA ECONOMIC INSTITUTE, LLC, a)
4 California LLC; RAYMOND MOBREZ,)
5 an individual; and ILIANA)
6 LLANERAS, an individual,)
7 Plaintiffs,)
vs.) Case No:
8 XCENTRIC VENTURES, LLC, an) 2:10-cv-01360-SVW-PJW
9 Arizona LLC, d/b/a as BADBUSINESS)
BUREAU and/or)
10 BADBUSINESSBUREAU.COM and/or)
RIP OFF REPORT and/or)
11 RIPOFFREPORT.COM; BAD BUSINESS)
12 BUREAU, LLC, organized and)
13 existing under the laws of)
14 St. Kitts/Nevis, West Indies;)
15 EDWARD MAGEDSON, an individual,)
16 and DOES 1 through 100,)
17 Inclusive,)
18 Defendants.)

19 Videotaped Deposition of EDWARD MAGEDSON,
20 taken on June 8, 2010 at the offices of
21 Jaburg & Wilk, P.C., 3200 North Central
22 Avenue, Suite 2000, Phoenix, Arizona,
23 commencing at 10:07 a.m. before Marcella
24 Daughtry, RPR and Arizona Certified Reporter.

25 PAGES 1 - 227

1 A Yes.

2 Q And what do you remember about Tina Norris?

3 A Just that she had applied for the Corporate
4 Advocacy Program.

5 Q Do you remember anything else about Tina 10:15:56
6 Norris?

7 A You know what, can I take -- well, there's a
8 question pending, and I don't know -- I want to have a
9 talk with counsel because I'm not sure of -- just I'm
10 not sure of something, so can I take -- can we take a 10:16:23
11 quick break?

12 Q How about this, why don't we have the court
13 reporter read back the last question; you make your
14 best effort at answering the question.

15 A Okay. 10:16:35

16 Q And then we can break.

17 MS. BORODKIN: Could we read back the
18 last question.

19 (The requested portion of the record was
20 read by the court reporter.) 10:16:51

21 MR. GINGRAS: Let me object to the
22 extent that it calls for attorney-client privilege. I
23 think what his --

24 MS. BORODKIN: David.

25 MR. GINGRAS: I'm making my objection, 10:16:55

1 Lisa.

2 MS. BORODKIN: You could state it
3 succinctly and state the basis for the objection.

4 MR. GINGRAS: I'm stating my objection.

5 To the extent that that question calls for any 10:17:03
6 discussion --

7 MS. BORODKIN: Are you instructing him
8 not to answer based on privilege?

9 MR. GINGRAS: Will you allow me to state
10 my objection, please? 10:17:10

11 MS. BORODKIN: I'm not going to allow
12 you to coach the witness.

13 MR. GINGRAS: To the extent the
14 question --

15 MS. BORODKIN: David -- 10:17:14

16 MR. GINGRAS: -- asks the witness for
17 any discussion --

18 MS. BORODKIN: David, I'm making an
19 objection on the record.

20 MR. GINGRAS: Counsel, I'm going to 10:17:17
21 terminate the deposition and suspend it for the day if
22 you continue with this. I'm just -- I'm just going to
23 let you know that. It's your choice if you want to
24 have this deposition or not.

25 MS. BORODKIN: This is on the record. 10:17:26

1 MR. GINGRAS: Yes.

2 MS. BORODKIN: So make your objection or

3 instruct him not to answer.

4 MR. GINGRAS: If you interfere with my

5 objection again, I'm going to terminate the deposition. 10:17:33

6 Do you understand me?

7 MS. BORODKIN: Why don't you finish

8 making your objection.

9 MR. GINGRAS: To the extent that

10 question calls for any discussions between you and your 10:17:39

11 lawyers, I'm instructing you not to answer.

12 THE WITNESS: Okay. The answer would be

13 yes, I do know -- was aware or remember, but there were

14 conversations that have to do with my attorney --

15 conversations with my attorney, and I don't think I 10:18:02

16 should be talking about what was discussed between

17 myself and my attorney.

18 MS. BORODKIN: Okay, we can break.

19 MR. GINGRAS: Do you still want to? Do

20 you still need to? 10:18:18

21 THE WITNESS: No, I don't need to break.

22 MS. BORODKIN: Let's go off the record.

23 Why don't we go off the record.

24 THE VIDEOGRAPHER: We are going off the

25 record. The time is 10:19 a.m. 10:18:26

1 attachment, but you used that word.

2 Q I did.

3 A Yes, I may make like an editorial comment, you

4 know, about something. And so, yes, you are -- I think

5 you have it correct. 10:40:59

6 Q And that's the plan?

7 A Right.

8 Q Because you said you don't remember right now

9 if that's ever happened?

10 A Yeah. I don't know if that's ever happened. 10:41:06

11 I mean, there are disputes, but surprisingly, to my own

12 self, it's really rare. Because anyone who joins the

13 program, again, gets it, and they know that they've got

14 to be prepared to make it right.

15 (Ms. Speth is now present for the 10:41:22

16 deposition proceedings.)

17 MS. BORODKIN: Attorney Speth just

18 walked into the deposition.

19 THE WITNESS: I don't think we wanted

20 anyone to know that. 10:41:34

21 Q BY MS. BORODKIN: Do you think it would help

22 you to look at documents to remember whether that

23 process you just described has ever happened?

24 A Sure.

25 Q What documents would you look at to know if 10:41:50

1 that ever happened?

2 A I don't know if you had any documents, I
3 thought you meant. But if I had something to look at,
4 you know, to refresh my memory -- like I said, I can't
5 remember. Anything is possible that... 10:42:04

6 Q What if I don't have the documents but you
7 have the documents?

8 A Okay. What document? Just be specific,
9 because I'm not sure now where you've gone to.

10 Q Any document that would help you remember 10:42:19
11 whether it's ever happened, what you just described,
12 that the complainant is still insistent on filing a
13 Ripoff Report after you've counseled them under the
14 CAP.

15 A If you told me you would give me \$5 million, 10:42:42
16 \$20 million, Ed, if you can go find something like
17 that, I'd be trying to look for a needle in a haystack.
18 Because I don't have -- there is no way I have anything
19 filed that way. There is no word I could search for
20 that would give me that. 10:42:59

21 Q How many people are in the CAP?

22 MR. GINGRAS: Objection. Calls for
23 information that would be subject to a protective
24 order, and I'm going to instruct the witness not to
25 answer that question. 10:43:09

Page 30

1 Q BY MS. BORODKIN: Are there so many people in
2 the CAP that you can't remember whether the thing you
3 just described has ever happened?

4 A Are there so many people in the program -- oh,
5 for the reason -- okay. You are back to the 10:43:28
6 question -- then what is your -- you went -- you asked
7 a question but now you are back to something. I want
8 to just make sure what you are asking.

9 Q The situation where a complainer is so
10 persistent that even after an enrolled member in CAP 10:43:47
11 has taken efforts to satisfy them, and Xcentric has
12 also sent this letter to them, that they insisted on
13 having their report posted on Ripoff Report. That's
14 the thing.

15 A And the question is? 10:44:08

16 Q Are there so many members in CAP that you
17 don't remember if that's ever happened?

18 A I don't know if that would be the case.
19 Just -- my memory with certain things would just not be
20 able to -- there is certain things I remember good and 10:44:23
21 certain things not. But like I told you, I'm not sure.
22 There could be -- and I'm almost thinking that there
23 was, because I remember doing some sort of like a
24 comment about something and I -- but -- and I think it
25 could have been only one time. And if it was, it was 10:44:36

1 the concept, get the idea about keeping customers
2 satisfied, get the idea that admitting you made a
3 mistake is okay and just correct it and show how you
4 made the mistake or how you corrected it is --
5 that's -- if they don't understand that, they shouldn't 12:06:19
6 be applying for the program.

7 Q Are you saying you think people should come to
8 you?

9 A Correct. I shouldn't have to solicit it.

10 Q And is it because you don't think it's 12:06:31
11 appropriate for Mr. Paisola to solicit it that you did
12 not want to align with him?

13 A Especially back in 2006 or '7. And I think
14 this was going on for a while. I didn't want anyone
15 soliciting it for whatever. I just didn't want them. 12:06:49

16 Q Why would Mr. Paisola want to solicit CAP
17 participants?

18 MR. GINGRAS: Objection. Foundation.

19 Q BY MS. BORODKIN: You can answer.

20 A I think I've answered that already. I told 12:07:06
21 you, my opinion is he wanted to try and align himself
22 with something that was good, like -- because he's an
23 advocate, what he does kind of in his business. So he
24 wanted to make it look like he was -- I don't know. I
25 told you it's my opinion. 12:07:24

1 So he wasn't making any money. No one
2 promised him a commission or anything like that. And
3 like I told you, I had to tell him to stop doing it. I
4 never gave him permission to do that.

5 MS. BORODKIN: Okay. I think we are 12:07:39
6 almost out of tape, so why don't we take a break and go
7 off the record.

8 THE VIDEOGRAPHER: This marks the end of
9 digital video recording number one in the videotaped
10 deposition of Edward Magedson. The time is 12:08 p.m. 12:07:50

11 MS. BORODKIN: Okay.

12 (The deposition was at lunch recess from
13 12:08 p.m. to 1:13 p.m.)

14 THE VIDEOGRAPHER: We are back on the
15 record. This is the beginning of digital recording 13:12:54
16 number two to continue the videotaped deposition of
17 Edward Magedson. The time is 1:13 p.m.

18 Q BY MS. BORODKIN: Do you use a cell phone?

19 A I use a cell phone, yes.

20 Q Do you use more than one cell phone? 13:13:20

21 A I don't want to answer any of these questions
22 regarding cell phones.

23 Q Why not?

24 A Because I'm not looking to be tracked or
25 anything like that. I mean, there's a whole host of 13:13:35

1 reasons why.

2 Q I'm asking because a big part of your defense
3 is that you know from taped telephone calls to Xcentric
4 that certain allegations made by the plaintiffs are
5 false, and I'm trying to discover whether there's 13:13:56
6 another explanation for some of these allegations.

7 A There could be no explanation, because no one
8 would ever ask somebody for money by phone. Nobody
9 would threaten anybody for money by phone, and it's
10 already been proven that by your client's own little 13:14:13
11 detailed little notes with his wife listening on the
12 phone. They both have the same dates and times and
13 everything of exactly what was said on those dates and
14 times, so we know there is really -- there is no other
15 time that this could have been. 13:14:29

16 So I understand that counsel is trying
17 to do the best job they can. My answer is no, I'm not
18 giving out any information. There is no protective
19 order, and I don't call -- I don't call clients. I've
20 had that rule for a long time. I just don't call them, 13:14:42
21 so it ain't gonna -- there's no -- there's nothing
22 there. There couldn't be anything there.

23 Q Without identifying the carrier or the number,
24 do you use more than one cell phone?

25 A Do I use -- what I do personally and what 13:15:01

1 Xcentric does is two different things, and I just -- I
2 just -- I don't want to answer any of these questions.

3 Q Okay. Today, you are Mr. Magedson. You are
4 not Xcentric. I don't hear an objection from your
5 lawyer, so you can answer. 13:15:25

6 A You are not my lawyer either.

7 Q True.

8 A Is it okay? I'm not -- I think he's not
9 objecting because I've already given my answer that I'm
10 not going to answer any of these questions, so there is 13:15:39
11 nothing for him to object to. He didn't say, no, Ed,
12 you can answer those.

13 MR. GINGRAS: Ed, to the extent it
14 matters, I ratify your objection and agree with it.
15 Without a protective order, these questions ask for 13:15:53
16 information that could be used to harass Mr. Magedson
17 that has caused him to be harassed in the past. We
18 believe it --

19 MS. BORODKIN: Okay. That's enough,
20 David. No speaking objections under California Rules 13:16:02
21 of Court, CCP in the federal rules. If you want to
22 have a dispute about it, we'll make another motion.
23 Please do not coach the witness anymore.

24 THE WITNESS: I already gave my answer.
25 He didn't -- how could he have coached me? I already 13:16:15

1 gave my answer. You asked and I answered you, so I
2 don't even understand what he was saying, so he
3 didn't -- he wasn't coaching me.

4 Q BY MS. BORODKIN: Me neither. And there was
5 no question pending, so I don't see any reason for him 13:16:26
6 to have added anything anyway.

7 A Well, because you seemed to have questioned
8 whether or not -- like you were trying to tell me, no,
9 it's okay if I answer because he wasn't objecting.

10 Q If your answer is you are not answering, then 13:16:37
11 we'll make a motion to compel.

12 A All right.

13 Q The cell phone that you say you used, is that
14 a business cell phone?

15 A Yes. 13:16:51

16 Q Does Xcentric pay for the bill?

17 A Yes.

18 Q Is it used exclusively for Xcentric business?

19 A Yes.

20 Q Okay. I'm going to mark as -- 13:16:59

21 A No. Excuse me. Is it used for -- exclusively
22 for Xcentric business? No. I've made personal calls.
23 I mean, you know, you get calls just like you do at the
24 office. You know, your children will call; your wife
25 will call; your babysitter will call or whatever, so 13:17:19

1 so much ripping off going on in general.

2 I know I got off the question, so...

3 Q That's okay.

4 Following up on that, if a company joins
5 the CAP, and after they join the CAP they do an 13:43:07
6 excellent job of responding to all customer complaints
7 and then they stop having complaints because of their
8 changed better practices, would they pay the same
9 amount?

10 A You know, BBB and other kinds of organizations 13:43:27
11 that are out there which have popped up over the years,
12 it's not really -- well, they don't have a website, but
13 they are like JD Power & Associates or any one of these
14 organizations. They have some sort of fee to be a
15 member, to stay a member because they, too -- whether I 13:43:49
16 like their service or disagree with it, we are
17 different, whatever. They are providing some sort of a
18 service.

19 If you are just even listed with them as
20 a member, they are going to have to respond and answer 13:44:02
21 to problems as a member. So consumers trust that BB
22 torch logo, that JD Power & Associates award that they
23 are given or any organization's seal of approval,
24 VeriSign, anything. They are all the same. They are
25 paying a fee to them to kind of be certified, but 13:44:22

Page 104

1 nobody can guarantee anything. But they are there to
2 certify, look, you get screwed, some better than
3 others, we are going to make sure it's made right, at
4 least that's the way Ripoff Report is. It's about to
5 verify, Ripoff Report Corporate Advocacy Program. 13:44:41

6 Q Isn't it cheaper for a company to join CAP
7 with as few reports as possible at the time that they
8 join?

9 A Yes.

10 Q So the longer they wait and the more reports 13:44:56
11 go up, the more expensive it's going to be, correct?

12 A Yes.

13 Q Okay. Looking at this page, the fourth and
14 last page of Exhibit 1, category number three, the
15 second questionnaire that Xcentric provides to 13:45:15
16 potential CAP members, is that the questionnaire we
17 talked about earlier today that is contained in the
18 body of an e-mail?

19 A The second -- that questionnaire happens once
20 somebody has let us know after they've received the 13:45:44
21 rates that says, wow, okay, I can afford this. This is
22 fine, or, you know, can you do anything about the
23 payment schedule? Can you give me a break? Oh, I love
24 it. No problem. Please, I want to hurry up. Please,
25 I want to join. What do I have to do? 13:46:03

1 The e-mail subject box, if I didn't
2 forget, gets -- says questions, and then I copy and
3 paste a list of questions that are there. It's the
4 same standard questions that I ask.

5 So in answer to your question, I think 13:46:22
6 you're wrong. No, it's not until after they've seen
7 the rates and they tell us, oh, wow, I can afford it;
8 can't afford it. Can I get a break? Can I make
9 payments? Can I whatever?

10 Q How many questionnaires total does a 13:46:38
11 prospective CAP member have to fill out before they
12 become -- before they are offered the CAP agreement:
13 one, two or three?

14 A Well, before the agreement there is questions.

15 Q How many questionnaires? 13:46:57

16 A I think there's two. Yeah, two. They fill
17 out the application, the original one. That's the only
18 one that's online. Now, I could ask them some
19 questions -- after looking over and seeing what type of
20 business it is, there could be some questions I ask 13:47:19
21 them in the e-mail which I -- comes out of my head what
22 I think that I may have to ask them, and then there's
23 the one that -- like I said, that's half the rates.

24 Q Okay. So setting aside the middle one that
25 you talked about -- 13:47:42

1 \$10,000 for. We are going to go by gross sales. So
2 that's never happened; never, never, never, never
3 happened.

4 Q How do you know it never happened?

5 A Because I'm the only one that's ever sold the 13:58:57
6 program to anybody. And I've never, ever, ever, ever,
7 ever asked anybody that question, never, and it's not
8 going to be an e-mail. And you might find some Shmoe
9 or somebody that wants to lie about it like Mr. Mobrez
10 and say I said that on the phone, when clearly there 13:59:19
11 was no conversation on the phone like that.

12 Q Has this mistaken paragraph been in every
13 questionnaire you've ever sent out?

14 A Could be. Yeah, probably is. But again, no
15 one has ever -- like nobody was going to volunteer to 13:59:34
16 me that I would know that that was in there and say,
17 oh, yeah, I see -- I go by gross sale. You know, I can
18 go by gross sales. Nobody wants to tell what their
19 gross sales are, and that's why it was a ridiculous
20 thought to begin with. 13:59:53

21 So how that got put in there, I just
22 don't know. I did it. It was my mistake, so -- so I
23 do have something to thank you for. You are scoring
24 some points with me. I'm going to mark those down.

25 Q Do you think you will change the questionnaire 14:00:08

1 as a result of this lawsuit?

2 A It will be changed tonight. So don't ask the
3 original -- you got the original. So don't ask, well,
4 I want you to preserve it or whatever, you know,
5 it's -- I'm going to have to -- it's a PDF, I think, or 14:00:22
6 something else like that.

7 Q Okay. Why don't we go back to Exhibit 1, the
8 last page and fourth page of Exhibit 1 again. Here, I
9 think it's this.

10 A Oh, thank you. 14:00:48

11 Q Sure.

12 Topic number three, the second
13 questionnaire, can we -- could you point out in Exhibit
14 8 where you think the second questionnaire might be, if
15 it's there. 14:01:07

16 A I don't think it's there because -- I mean, I
17 can't remember. Like I told you, I thought this was
18 somebody that maybe just signed up last week. So, you
19 know, there's a lot of companies out there with similar
20 names. That's ridiculous. So in my mind being -- 14:01:24
21 what's the word I'm looking for -- dealing with so
22 much, it's easy for me to make a mistake.

23 Q Did anyone sign up for CAP last week?

24 A No, I don't know. No, no, I don't have -- no,
25 they didn't sign up. I don't know. I could send out a 14:01:44

Page 114

1 contract, and I can get it back three months later.

2 Q Sorry.

3 A So what's the other question?

4 Q Where's the second questionnaire?

5 A I guess it wouldn't be here because -- unless 14:02:00

6 I'm missing it, but I don't think I am. Unless --

7 because -- I don't know. You may know better than I.

8 Unless they asked and they said that they wanted --

9 they wanted an agreement and they are ready to go and

10 sign up, before they would get the agreement, that 14:02:31

11 questionnaire would be there. So I don't see it here.

12 Q Is the second questionnaire anywhere in

13 Exhibit 9?

14 A Exhibit 9, are you sure 9? That's 8.

15 Q I think it's this. 14:02:49

16 A Okay. You didn't do a good job in blocking

17 out Jennifer Croat's name.

18 Q Oh, neither did you.

19 A I wasn't supposed to block it out.

20 Q That's okay. 14:03:48

21 A It kind of looks like a repeat. Maybe she got

22 this sent twice. But, no, I don't see the second

23 questionnaire there.

24 Q Do you have the second questionnaire

25 somewhere? 14:04:16

1 A Not -- no. No. I shouldn't be joking. I'm
2 sorry. I can't help it. I'm sorry. I shouldn't do
3 that. Okay, no, I don't. I mean, I don't have it here
4 with me.

5 Q Do you know where one would be? 14:04:30

6 A Cyberspace. No, no, actually, there is no
7 way -- no, I wouldn't have any way to get it, because I
8 have no way to access my e-mail.

9 Q Is it in your e-mail?

10 A I have it. That's the only way I can get it. 14:04:47

11 Q Why can't you get to your e-mail?

12 A Because my e-mail is such that I can't access
13 it. I wouldn't want to be able to have it accessed.
14 For security reasons, it's not accessible.

15 Q Can Ben Smith access it? 14:05:02

16 A No, no, he can't even.

17 Q Who can access it?

18 A (Indicating.)

19 Q You?

20 A Let the record show I raised my hand. 14:05:08

21 Q So if you were to access it, could you find
22 the second questionnaire?

23 A Yeah, but I don't have my e-mail with me.

24 Q Oh, you mean with you today?

25 A Right. I don't have access. I don't have --I 14:05:19

1 didn't bring anything -- I didn't bring a computer with
2 me, and I'd have to be on my computer.

3 Q It's in your e-mail, you are saying, and not
4 here?

5 A Yeah. 14:05:27

6 Q And would you access your e-mail from your
7 office?

8 A Yes.

9 Q Okay. Is that where the contract is, too?

10 A That's where a contract -- yeah, of course. 14:05:44

11 Yeah, uh-huh. But I don't know. Like I said, I
12 thought I was mistaking her for somebody else, but
13 maybe I'm not. So I -- there could be a contract that
14 goes with this. I don't know. Because there is no way
15 for me to -- there's too much going on for me to 14:06:06
16 remember that. Whatever.

17 Q I don't think you have a contract with her.
18 But my question is, a contract between Xcentric and a
19 CAP member, which can be one of the ones that we talked
20 about last week, do you know where one of those would 14:06:25
21 be?

22 A (No oral response.)

23 Q Oh, you nodded.

24 A Of course. Well, it would be a couple of
25 things. One is, I don't know without a protective 14:06:35

1 know in that area or not know. How could he know what
2 another company can do or can't do? I don't know what
3 another company can do or can't do. I only go by
4 what -- I'm only going by what other SEO people have
5 told me. 14:59:40

6 Q Like who?

7 A I don't know. Like who?

8 Q What SEO people?

9 A I don't know. I can't think of any name in
10 particular. 14:59:48

11 Q Have you consulted an SEO consultant?

12 A No, but SEO people call me all the time for
13 their clients.

14 Q Why do they call you?

15 A They are interested in reputation management 14:59:59
16 for their clients.

17 Q In what regard are they interested in that?

18 A To try and help them with their online
19 reputation, and they don't engage in this kind of
20 activity. It's considered illegal. It's frowned upon 15:00:13
21 by search engines.

22 Q What kind of activity are you referring to?

23 A Where they bombard the search engine with
24 like -- let's say you had XYZ Law California, and XYZ
25 Law had some complaints about them. The way an SEO 15:00:32

Page 146

1 company -- one of these bad companies would handle
2 it -- I call them bad -- they would bombard the
3 Internet or the search engines with useless blogs and
4 other things to try and push down, whether it be Ripoff
5 Report, another negative complaint site or something on 15:00:55
6 the Internet.

7 Q You think Ripoff Report is a negative
8 complaint site?

9 A It's -- people post negative and positive on
10 Ripoff Report. 15:01:08

11 Q What kind of positive do they post?

12 MR. GINGRAS: Foundation.

13 Q BY MS. BORODKIN: You can answer it.

14 A Yeah, could you be more specific?

15 Q Whatever you were referring to. 15:01:17

16 A They file positive rebuttals to any kind of a
17 complaint. They are filed -- as we sit here, they are
18 being filed.

19 Q Anything else?

20 A Anything else? 15:01:33

21 Q That's positive that gets posted on Ripoff
22 Report that you can think of?

23 A Positive. A positive is positive. I mean, I
24 don't know how you want me to elaborate.

25 Q Well, besides rebuttals, who are written by 15:01:50

1 the subjects of the reports, are there any other
2 positive kinds of things that are posted on Ripoff
3 Report?

4 A Sure. There is stuff that we post about the
5 CAP members. 15:02:03

6 Q Aside from the things that the subjects of the
7 Ripoff reports post as rebuttals and the things that
8 you post as CAP reports and investigation results, are
9 there any other -- are there any other kinds of
10 positive things that are posted on RipoffReport.com? 15:02:18

11 A Those positive things can include a number of
12 different things, which I can't even imagine, so I'm
13 not sure if this is a loaded question or not. I don't
14 know. I can't sit here -- I could start guessing what
15 kind of things could be posted, but I'm sure birth 15:02:34
16 announcements and happy birthdays --

17 Q I don't want you to guess, Mr. Magedson.

18 A Okay. But I don't know. There's no way I
19 know. It's usually positive things, experiences the
20 companies -- consumers would have. 15:02:47

21 Q Have any of those types of things been posted
22 on Ripoff Report?

23 MR. GINGRAS: Foundation.

24 THE WITNESS: All day long.

25 Q BY MS. BORODKIN: Could you give me one 15:02:56

Page 148