



John Paschal <john.paschal.2012@lawmail.usc.edu>

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## Fwd: Asia Economic Institute v. Xcentric Ventures (C. D. Cal. 10-cv-1360) Motion to Compel Deposition of Edward Magedson and Xcentric Ventures LLC

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Lisa Borodkin <lisa\_borodkin@post.harvard.edu>

Fri, Jul 2, 2010 at 7:47 PM

To: alexandra@asiaecon.org, kristi@asiaecon.org, Jack Paschal <jack.paschal.2012@lawmail.usc.edu>, iliana@asiaecon.org, raymond@asiaecon.org

----- Forwarded message -----

From: **Lisa Borodkin** <lisa\_borodkin@post.harvard.edu>

Date: Fri, Jul 2, 2010 at 7:46 PM

Subject: Asia Economic Institute v. Xcentric Ventures (C. D. Cal. 10-cv-1360) Motion to Compel Deposition of Edward Magedson and Xcentric Ventures LLC

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Dear Ms. Anglon-Reed,

We represent the Plaintiffs in Asia Economic Institute LLC et al. v. Xcentric Ventures LLC et al, C. D. Cal. Civil Case No. 10-cv-1360.

On June 24, 2010, this Court held a hearing on discovery issues and issued an order providing in part that **"Plaintiffs may continue the deposition of Defendant Magedson, as discussed at the hearing."** DN-82 at 2 (emphasis added). A copy of the June 24, 2010 Order is attached for the Court's ease of reference.

Plaintiffs now request that the Court order (1) Defendants to produce Defendant Magedson for further deposition, on a date between July 5 and July 8 if possible and (2) that Defendant Magedson provide answers at deposition under oath on the following topics and on reasonably related follow up questions, and (3) produce and answer questions at deposition about the documents identified in Plaintiffs' June 25, 2010 letter.

### I. Continued Deposition

Plaintiffs have requested a date to continue Defendant Magedson's deposition.

Despite the Court's Order, Defendants will not schedule a date for the continued deposition of Defendant Magedson.

A continuation of the deposition of Defendant Magedson is essential. There are still necessary facts pertaining to the extortion claim set for trial on August 3, 2010 that Defendants have refused to answer. These are outlined in more detail in section II, below.

The deposition would ideally be continued prior to July 12, 2010, the hearing date on Defendants' pending motion for summary judgment as to all claims in this action. See DN-81. (copy attached).

### II. Topics for Continued Deposition

On June 25, 2010 and July 2, 2010, Plaintiffs and Defendants exchanged letters, as ordered by the Court, on the topics on which Plaintiffs request further examination of Defendant Magedson. (copies attached)

On July 2, 2010, the parties met and conferred telephonically in good faith to narrow the discovery dispute.

The parties were successful in eliminating all but 4 of the 21 disputed topics identified in the June 25 and July 2 letters, excluding the deposition document subpoena requests (discussed in III, below).

The topics on which the parties are unable to reach agreement are (numbering is from Defendants' July 2, 2010 letter):

**Topics 7 and 9 (Number of participants in the Corporate Advocacy Program ("CAP") and means of soliciting participants)**

On June 2, 2010, Plaintiffs took the 30(b)(6) deposition of Defendant Xcentric Ventures LLC, through Xcentric's designee, Edward Magedson.

Plaintiffs sought information from Xcentric regarding the nature and extent of CAP and how many participants become enrolled in CAP.

"Q No question pending.

6 Now, when you ask -- when Xcentric asks  
7 for a 36-month commitment through these contracts, who  
8 exactly asks for the commitment from -- who at  
9 Xcentric -- strike that.

10 When Xcentric asks for a 36-month  
11 commitment through a contract, who at Xcentric asks for  
12 that commitment?

13 A Me.

14 Q You. Anyone else?

15 A No.

16 Q No. Just you?

17 A Just me.

18 Q Okay. How many of these contracts have you  
19 sent out and reviewed? How many -- strike that.

20 How many of these contracts have you  
21 been involved with? By you, I mean Xcentric.

22 A Without a protective order, I don't want to  
23 answer that question.

24 Q So you are refusing to answer it?

25 A Without a protective order, I don't want to  
0122

1 answer that question.

2 Q I'm not asking you about specific people. I'm  
3 not asking you about specific businesses, no addresses,  
4 no nothing, just a number. That's it.

5 A No, because -- I'm not going to explain why.  
6 But it's -- it's already caused a problem in the past,  
7 and I'm not going to explain -- I'm not going to give  
8 that unless there is a protective order in place."

June 2, 2010 Transcript, 121:5-23.

and also:

"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.

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  
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  
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?

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  
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  
1 years ago. I'm talking years ago."

June 8, 2010 Transcript, 29:21-31:2.

In the July 2, 2010 telephone conference, Defendants offered to stipulate that there are at least two members in CAP.

Defendants' proposal is not a sufficient substitute for the lines of questioning that were closed off regarding CAP.

The nature, size, extent and continuity of CAP is material to the RICO claim on whether there is a pattern of predicate acts of extortion, whether the pattern is open-ended and has continuity.

#### **Topic 16 (Defendants' Use of Cell Phones to Conduct Xcentric Business)**

Plaintiffs sought testimony regarding Defendant Magedson's use of cell phones to conduct Xcentric business. Specifically, Plaintiffs seek to inquire whether there are any other explanations or conversations relevant to the process of how Xcentric enrolls members in CAP.

"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?

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  
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  
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  
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.

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,  
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  
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.

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  
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  
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  
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  
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  
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  
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.

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 --  
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  
1 no. The answer would be, no, it's not used strictly  
2 for business."

June 6, 2010 Transcript 86:16:-90:2.

Defendants proposed that the Court review Defendant Magedson's phone records in camera and compare them to a list of numbers provided by Plaintiffs.

Plaintiffs proposed that Defendant Magedson review his phone records to refresh his memory and then testify.

Defendants' proposal does not account for incoming calls to Mr. Magedson's cell phones. Also, it does not permit follow-up questioning on whether Defendant discusses CAP with other potential enrollees on Xcentric's business cell phone line.

#### **Topic 18 (Positive Reports)**

Plaintiffs allege that Defendants cause overwhelmingly negative material to be posted about business and people, and cause the negative material to be displayed prominently on Defendants' website and in Internet search results, unless the subject enrolls in CAP. For enrollees in CAP, Plaintiffs allege that Defendants cause positive material to be displayed more prominently on their website and in Internet search results than non non-CAP members. Plaintiffs allege this amounts to attempted extortion under California law.

Plaintiffs sought testimony on what positive matter Defendants cause or permit to be posted:

" Q You think Ripoff Report is a negative  
8 complaint site?  
9 A It's -- people post negative and positive on  
10 Ripoff Report.  
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.  
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?  
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  
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.

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?

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  
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.

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  
1 example?

2 A No, I wouldn't even -- I wouldn't want to pick  
3 on a company or pick out something that's used in this  
4 deposition."

June 8, 2010 Transcript at 146:7-148:4.

Plaintiffs seek testimony about the positive matter that is actually be posted on Defendants' website without having to join CAP. Plaintiffs have only seen rebuttals, which are secondary to the negative reports and feature less prominently on Defendants' web site and in Internet search results.

Defendants advised Plaintiffs that they believe the question was asked and answered, is irrelevant to the extortion claim, that Plaintiffs can view it on the Internet, and that the information could better be sought by written discovery.

Plaintiffs contend these responses are not adequate because they do not bind the Defendants, and are unduly burdensome and time-consuming.

### III. Documents for Continued Deposition

Plaintiffs served a deposition document subpoena at around the same time as the June 8, 2010 deposition.

Following the July 2, 2010 conference of counsel, Plaintiffs request production of the following 5 out of the original 9 categories, and request permission to examine Defendant Magedson on them at the continued deposition:

"1. Emails sufficient to show the typical manner in which Xcentric Ventures gives price quotes for enrollment and monthly fees for the Corporate Advocacy Program ("CAP").

3. The second questionnaire that Xcentric provides to potential CAP members prior to enrollment ("Second Questionnaire"), as identified in the 30(b)(6) deposition of Xcentric.

4. Documents sufficient to evidence a typical contract between Xcentric and a CAP member (which can be one of the CAP members identified in the 30(b)(6) deposition of Xcentric).

5. Documents sufficient to evidence a typical example of the responses to the Second Questionnaire by a successful CAP applicant that ultimately enrolled in CAP.

9. Documents sufficient to evidence a typical request from a person/company to be enrolled in CAP, after having been notified of the opportunity to rebut a negative "Ripoff Report," as identified at the 30(b)(6) deposition of

Xcentric."

These documents and follow-up questions are necessary because, inter alia, Xcentric failed to produce a prepared witness at the 30(b)(6) deposition on the exact mechanics of enrolling in CAP:

"Q BY MR. BLACKERT: Okay. Walk me through how  
14 it -- the steps -- how it gets from the rebuttal  
15 e-mails to the business actually becoming enrolled in  
16 the CAP.

17 A You would have to ask that again.

18 Q Okay. Walk me through the steps after the  
19 rebuttal e-mail that the business gets enrolled into  
20 the CAP program.

21 MR. GINGRAS: Objection. I don't think  
22 this accurately reflects his testimony.

23 THE WITNESS: I'm not even understanding  
24 your question.

25 Q BY MR. BLACKERT: Okay. Fine. I will  
0123

1 rephrase it.

2 MR. GINGRAS: I think we first need  
3 to clarify what you are referring to as the rebuttal  
4 e-mail. We have talked about filing rebuttals and then  
5 sending e-mails. Those are two different things.

6 Q BY MR. BLACKERT: You testified earlier that  
7 you -- strike that.

8 You testified earlier that you send an  
9 e-mail after -- you send an e-mail suggesting that an  
10 individual file a rebuttal, correct, an individual at a 1  
11 business?

12 A Correct.

13 Q What happens next?

14 A I can't speculate on what happens next. I  
15 don't know what you mean. What do you mean what  
16 happens next?

17 Q If the individual or business wants to go  
18 forward with the CAP program --

19 A Okay.

20 Q -- what's your next contact with them?

21 A They want to go next?

22 Q Yes.

23 A If they say they want to join the program, I  
24 send them a more detailed questionnaire about the  
25 company.

1 Q Is that questionnaire different from the  
2 questionnaire on your website, on Ripoff Report's  
3 website?

4 A Yes.

5 Q It is different. Okay.

6 And you said it's more detailed?

7 A Yes.

8 Q How is it more detailed?

9 A It gets into -- and this is still -- they  
10 haven't been approved yet.

11 Q Right.

12 A So it depends on how they answer the questions  
13 to these -- to this e-mail, but there is questions  
14 like, why did you get complaints? What was the cause

15 of the complaints? What improvements? I want -- I  
16 want information right now, you know. How are you  
17 going to make -- what improvements have you made? What  
18 was -- what were the problems and what are you doing to  
19 avoid those problems in the future? The name of the  
20 person who will be signing the agreement. What's the  
21 name of the company that the agreement's gonna be in?  
22 Why do you feel -- I think it's, why do you feel -- I  
23 forget. I can't.  
24 Q That's fine.  
25 A I can't remember. I can't remember."

June 2, 2010 Transcript at 122:14-25-124:25.

Also, Defendant Magedson identified that such documents exist, but would not produce or testify as to their contents:

"Q Okay. Looking at this page, the fourth and  
14 last page of Exhibit 1 [the June 7, 2010 document deposition subpoena], category number three, the  
15 second questionnaire that Xcentric provides to  
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  
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?

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  
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  
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?

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  
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 --

1 A I don't know what you mean by middle one.

2 Q Well, you said you might have to ask them some  
3 questions in e-mail --



4 A Right, before they --  
5 Q -- off the top of your head or out of your  
6 head or something to that effect.  
7 A Right. Even before I even send them the  
8 questionnaire, that's the final questionnaire before I  
9 fill out the agreement."

June 8, 2010 Transcript 104:13-106:9.

Defendant Magedson has stated that he will produce the CAP contract if his attorneys permit him:

"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.  
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.  
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 --  
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  
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  
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  
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.  
16 A Okay. You didn't do a good job in blocking  
17 out [REDACTED]'s name.  
18 Q Oh, neither did you.  
19 A I wasn't supposed to block it out.  
20 Q That's okay.  
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?  
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?

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.

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?

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.

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  
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.

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.  
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  
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  
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  
1 order if I want that to be -- to be accessible. And so  
2 if there's, you know, proper protective order, I'm told  
3 by my attorneys I can --

4 Q Don't tell me what your attorneys said to you,  
5 please.

6 A No, I didn't say -- I said, and if my  
7 attorneys tell me that I can, I would. I wasn't  
8 telling you what my attorneys said.

9 Q Okay. So I'm not asking you about  
10 conversations between you and your attorneys, and I'm  
11 not asking you what the contract says; I'm just asking

12 you, following up on last week, the type of contract  
13 you described today, Ed -- I'm sorry, forgive me --  
14 today, Mr. Magedson, you know where that might be,  
15 correct?  
16 A Yes."

June 8, 2010 Transcript at 113:7-117:16.

Plaintiffs request that this Court order Defendants attorneys to have Defendant Magedson produce the Second questionnaire, CAP contract and related emails, and to permit Plaintiffs to examine Defendant Magedson about them.

Plaintiffs have no objection to Defendants setting forth their version of today's telephone conference as a reply to this email.

Plaintiffs counsel are available for a telephonic hearing at any time.

Respectfully submitted,

Lisa J. Borodkin

cc: David Gingras, Maria Crimi Speth, Paul Berra, Daniel Blackert (by email)

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**4 attachments**



**June 24 2010 Order on Discovery 10-cv-1360.pdf**  
14K



**June 24, 2010 Order Continuing MSJ Hearing 10-cv-1360.pdf**  
9K



**June 25, 2010 letter AEI to Xcentric.pdf**  
84K



**July 2, 2010 letter Xcentric to AEI.pdf**  
167K

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