



Lisa Borodkin <lborodkin@gmail.com>

AEI et al. v. Xcentric (C.D. Cal. 10-cv-1360) Draft Rule 26f Report

David Gingras <david@ripoffreport.com>

Fri, May 7, 2010 at 9:50 PM

Reply-To: david@ripoffreport.com

To: Lisa Borodkin <lborodkin@gmail.com>

Cc: Lisa Borodkin <lisa_borodkin@post.harvard.edu>, Maria Crimi Speth <mcs@jaburgwilk.com>, Daniel Blackert <blackertesq@yahoo.com>

Lisa,

Prior to your departure from the depo this afternoon, I told you that I would give you a response to the jury trial issue by the end of the day. In order to fulfill that promise, I wanted to let you know our position – if this case goes to trial, we believe it is appropriate for the matter to be tried to a jury as the court's trial setting order already indicates.

As for the Rule 26(f) report, for reasons that I am sure Dan has explained to you by now, I believe it is inappropriate to have any further discussions about any substantive aspect of this case unless and until you and Dan have an opportunity to meet and confer with your clients re: their intentions going forward. I also strongly recommend that both you and Dan immediately contact the State Bar of California and/or seek independent legal counsel regarding your personal ethical obligations under the California Rules of Professional Conduct and California Business & Professions Code in light of today's developments.

For now, my intent is to send you and Dan a comprehensive demand letter on Monday which sets forth Defendants' positions as to numerous legal and ethical issues in light of today's developments. Until that letter is sent, and until you have a chance to review and respond to it, I believe it is inappropriate to discuss any further aspects of this case.

I will forward my letter to you on Monday and we can then discuss where things stand and how this case will be proceeding, if at all.

David Gingras, Esq.

General Counsel

Xcentric Ventures, LLC

<http://www.ripoffreport.com/>

David@RipoffReport.com

Ripoff Report

PO BOX 310, Tempe, AZ 85280

Tel.: (480) 668-3623

Fax: (480) 248-3196

From: Lisa Borodkin [mailto:lborodkin@gmail.com]

Sent: Friday, May 07, 2010 3:25 PM

To: <david@ripoffreport.com>

Cc: Lisa Borodkin; Maria Crimi Speth; Daniel Blackert; <alexandra@asiaecon.org>; <kristi@asiaecon.org>

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]

Version: 9.0.819 / Virus Database: 271.1.1/2858 - Release Date: 05/06/10 11:26:00
