

DANIEL F. BLACKERT, ESQ., CSB No. 255021
LISA J. BORODKIN, ESQ., CSB No. 196412

Asia Economic Institute
11766 Wilshire Blvd., Suite 260
Los Angeles, CA 90025
Telephone (310) 806-3000
Facsimile (310) 826-4448
Daniel@asiaecon.org
Blackertesq@yahoo.com
lisa_borodkin@post.harvard.edu

Attorneys for Plaintiffs,
Asia Economic Institute, LLC
Raymond Mobrez, and
Iliana Llaneras

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

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

Plaintiffs,

vs.

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

Defendants.

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

**NOTICE OF LODGING OF
[PROPOSED] ORDER GRANTING
PLAINTIFFS' EX PARTE MOTION
(1) UNDER RULE 56(f) TO DENY
OR CONTINUE DEFENDANTS'
MOTION FOR SUMMARY
JUDGMENT TO CONDUCT
FURTHER DISCOVERY; (2)
COMPELLING DEFENDANT ED
MAGEDSON TO APPEAR FOR
DEPOSITION WITH DOCUMENTS
AND; (3) FOR SANCTIONS
UNDER LOCAL CIVIL RULES 37-4
AND 83-7**

1 TO ALL PARTIES AND THEIR COUNSEL OF RECORD HEREIN:

2 PLEASE TAKE NOTICE that Plaintiffs hereby lodge the attached
3 proposed Order (1) under Federal Rule of Civil Procedure 56(f) to deny or
4 continue Defendants' Motion for Summary Judgment, (2) to compel Defendant Ed
5 Magedson to appear for a Court-supervised continuance of his deposition with
6 documents on July 14, 2010, and (3) to award Plaintiffs monetary sanctions under
7 Local Rules 37-4 and 83-7. The Motion is being filed concurrently herewith.
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9 DATED: July 8, 2010
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11 /s/ Lisa J. Borodkin
12 LISA J. BORODKIN
13 Attorneys for Plaintiffs,
14 Asia Economic Institute LLC,
15 Raymond Mobrez, and Iliana Llaneras
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