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7
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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

12
13 ASIA ECONOMIC INSTITUTE, a
California LLC; RAYMOND
14 MOBREZ an individual; and ILIANA
LLANERAS, an individual,

15 Plaintiffs,

16 vs.

17 XCENTRIC VENTURES, LLC, an
18 Arizona LLC, d/b/a as BADBUSINESS
BUREAU and/or
19 BADBUSINESSBUREAU.COM
and/or RIP OFF REPORT and/or
20 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.

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

PLAINTIFF ASIA ECONOMIC
INSTITUTE, LLC'S RESPONSES TO
DEFENDANTS' FIRST SET OF
REQUESTS FOR PRODUCTION

Asia Economic Institute et al v. Xcentric Ventures LLC et al

Doc. 90 Att. 2

1 Pursuant to Federal Rule of Civil Procedure 34, Responding Party, Asia
2 Economic Institute LLC (“AEI”, “Respondent” or “Responding Party”), responds
3 to Defendants, Edward Magedson and Xcentric Ventures, LLC (“Defendants” or
4 “Propounding Parties”) first set of Requests for Production (“RFP”) as follows:

5
6 **GENERAL OBJECTIONS**
7

- 8 1. The following general objections apply to Defendants’ Requests for
9 Production and are incorporated by reference into the responses
10 contained herein. The assertion of the same, similar, or objections, or the
11 provisions of partial responses in response to Defendants’ Requests for
12 Production does not waive AEI’s objections as set forth below.
- 13 2. AEI objects to Propounding Parties’ Requests for Production as they
14 were prematurely served prior to the conference of counsel under Rule
15 26(f), The Rule (f) conference of counsel occurred on April 27, 2010.
16 Defendants served these Requests for Production on April 26, 2010.
- 17 3. Respondent objects to Defendants’ “Instructions” and “Definitions” to
18 the extent that they purport to impose discovery obligations that differ
19 from or exceed the discovery obligations imposed by the Federal Rules
20 of Civil Procedure.
- 21 4. Respondent objects to these Requests for Production to the extent that
22 they seek information that is protected by the attorney-client privilege,
23 the work-product privilege or any other privilege, protection, or
24 immunity under the governing law.
- 25 5. Respondent objects to these Requests for Production to the extent that
26 they are overly broad, vague and ambiguous, unduly burdensome,
27 harassing, oppressive, and/or seek information that is not relevant to the
28

1 issues in this lawsuit or reasonably calculated to lead to the discovery of
2 admissible evidence.

3 6. Respondent objects to these Requests for Production to the extent they
4 seek trade secret, proprietary, confidential, financial, or commercially
5 sensitive information the disclosure of which could reasonable impact
6 Respondent competitive or business position or result in a breach by
7 Respondent of an obligation to a third party to maintain such confidential
8 information.

9 7. Respondent objects to these Requests for Production to the extent that
10 they seek the premature discovery of expert testimony. Respondent will
11 submit expert reports when appropriate and make their experts available
12 for deposition.

13 8. Respondent objects to these Requests for Production to the extent they
14 seek to impose an obligation on Respondent to provide information for or
15 on behalf of any person or entity other than Respondent, and/or seek
16 information that is not in Respondent's possession, custody, or control.

17 9. Respondent objects to these Requests for Production to the extent that the
18 disclosure sought is unreasonably cumulative or duplicative, or is
19 obtainable from some other source that is more convenient, less
20 burdensome, or less expensive.

21 10. Respondent objects to Propounding Parties' Request for Production to
22 the extent they seek information inadmissible at the August 3, 2010
23 bifurcated trial as ordered by Judge Stephen V. Wilson on April 19,
24 2010.

25 11. These general objections are made to the extent applicable to each of the
26 Requests for Production as if the objections were fully set forth herein.

27 12. The following Responses are based on Responding Party's
28 current knowledge. Additional information may be in documents that

1 Responding Party has not yet located or received or with witnesses who
2 have not yet been deposed or interviewed. Respondent reserves the right
3 to supplement its responses up to and through any hearing in this matter.
4

5 13. Subject to and without waiving these general objections or any
6 other objection or claim or privilege, Respondent hereby responds to
7 Defendants' Requests for Production as follows:
8

9 **RESPONSES**

10 **DEFENDANTS' RFP NO. 1**

- 11
- 12 1. Produce copies of each and every separate statement that appears
13 (whether now, or in the past, if still available to YOU) anywhere on the
14 ROR Site regarding or referring to YOU which YOU alleged to be false.

15 **RESPONSE TO RFP NO. 1:**

16

17 Responding Party objects to this request as vague, ambiguous, and
18 overbroad. In particular, this request is not relevant and not likely to lead to the
19 discovery of admissible evidence, overbroad, harassing, and burdensome because
20 the request falls outside the scope of the bifurcated trial ordered by Judge Stephen
21 V. Wilson on April 19, 2010 and set for August 3, 2010.

22 Without waiving these objections, Responding Party responds as follows:
23 After a diligent search and reasonable inquiry, Responding Party will produce the
24 requested documents in their possession, custody, or control.
25
26
27
28

1
2 **DEFENDANTS' RFP NO. 2**
3

- 4 2. Produce copies of any and all documents which YOU have which show
5 that any of the specific statements identified in YOUR response to
6 Request #1 above are, in fact, false. If NONE, so state.

7 **RESPONSE TO RFP NO. 2:**
8

9 Responding Party objects to this request as vague, ambiguous, overbroad,
10 calls for a legal conclusion, unduly burdensome and harassing. In particular, this
11 request is not relevant and not likely to lead to the discovery of admissible
12 evidence, harassing and burdensome because the request falls outside the scope of
13 the bifurcated trial ordered by Judge Stephen V. Wilson on April 19, 2010 and set
14 for August 3, 2010. The Court expressly stated that evidence of truth or falsity
15 will not be admitted at the bifurcated trial. Responding Party also objects to this
16 request as calling for the disclosure, implicitly or explicitly, of information
17 protected by Plaintiffs' rights of privacy, financial privacy and rights pertaining to
18 proprietary business information, trade secret, confidential business information or
19 competitively-sensitive information. Responding Party further objects to this
20 request based on the right of privacy via statute, constitution, and common law,
21 and as calling for the disclosure of private information, including but not limited
22 to, private financial and other sensitive information, of a consumer.

23 Without waiving these objections, Responding Party, after a diligent search
24 and reasonable inquiry, responds as follows: Many of the statements regarding
25 Plaintiffs on Defendants' website are false. Defendants are asking Plaintiffs to
26 produce documents that may or may not exist. Defendants have refused to identify
27 the author(s) of the statements at issue. Unless Defendants provide this information
28 and narrow this Request, Plaintiffs' are unable to respond.

1
2 **DEFENDANTS' RFP NO. 3**

- 3
4
5 3. Produce copies of any/all documents YOU have showing any threats
6 made to YOU by Defendants. If NONE, so state.

7
8 **RESPONSE TO RFP NO. 3:**

9
10 Responding Party objects to this request as vague, ambiguous, and on the
11 ground that some of the information needed to fully respond to this Request is in
12 the possession of or equally available to Propounding Party.

13 Without waiving these objections, Responding Party, after a diligent search
14 and reasonable inquiry, responds as follows: Responding Parties will produce or
15 make available for inspection the requested documents in their possession,
16 custody, or control.

17
18 **DEFENDANTS' RFP NO. 4**

- 19
20 4. Produce copies of any/all documents YOU have showing that Defendants
21 made a threat to injure YOUR property or reputation unless YOU paid
22 money to Defendants. If NONE, so state.

23
24 **RESPONSE TO RFP NO. 4:**

25
26 Responding Party objects to this request as vague, ambiguous, and on the
27 ground that some of the information needed to fully respond to this request is in
28 the possession of or equally available to Propounding Party

Without waiving these objections, Responding Party, after a diligent search
and reasonable inquiry, responds as follows: Responding Party will produce the

1 requested documents in their possession, custody, or control. In addition,
2 Responding Party identifies the statements, existence and source code of the
3 Defendants' website itself as an implicit threat to injure Responding Party's
4 reputation, and therefore responsive to this request. In addition, Responding Party
5 identifies the email exchange and telephone recordings between Defendants and
6 Plaintiffs in which Ed Magedson insisted on an application to the Corporate
7 Advocacy Program ("CAP") as a precondition to further communications as an
8 threat, given the description of CAP on Defendants' website, and therefore
9 responsive to this request.

10
11 **DEFENDANTS' RFP NO. 5**

- 12
13 5. Produce copies of any/all documents YOU have in which Defendants
14 asked YOU for money. If NONE, so states.

15
16 **RESPONSE TO RFP NO. 5:**

17
18 Responding Parties object to this request as vague, ambiguous, and on the
19 ground that the information needed to fully respond to this request is in the
20 possession of or equally available to Propounding party.

21
22 Without waiving these objections, Responding Party, after a diligent search
23 and reasonable inquiry, respond as follows: Responding Party will produce the
24 requested documents in its possession, custody, or control. In addition, Responding
25 Party identifies the email exchange and telephone recordings between Defendants
26 and Plaintiffs in which Ed Magedson insisted on an application to the Corporate
27 Advocacy Program ("CAP") as a precondition to further communications as an
28 implicit demand for money, given the description of CAP on Defendants' website,
and therefore responsive to this request.

1
2 **DEFENDANTS' RFP NO. 6**

- 3
4 6. Produce copies of any/all documents YOU have in which Defendants
5 asked YOU for any property or anything else of value. If NONE, so state.

6
7 **RESPONSE TO RFP NO. 6:**

8
9 Responding Party objects to this request as vague, ambiguous and on the
10 ground that the information needed to fully respond to this request is in the
11 possession of or equally available to propounding party.

12 Without waiving these objections, Responding Party, after a diligent search
13 and reasonable inquiry, responds as follows: Responding Party will produce the
14 requested documents in its possession, custody, or control. In addition, Responding
15 Party identifies the email exchange and telephone recordings between Defendants
16 and Plaintiffs in which Ed Magedson insisted on an application to the Corporate
17 Advocacy Program ("CAP") as a precondition to further communications as an
18 implicit demand for property or something of value, given the description of CAP
19 on Defendants' website, and therefore responsive to this request.

20
21 **DEFENDANTS' RFP NO. 7**

- 22
23 7. Produce copies of any/all documents reflecting complaints that have been
24 made against YOU in the past five (5) years by either YOUR current
25 and/or former customers and/or YOUR current and/or former employees
26 (including independent contractors, if any). For the purpose of this
27 request, "complaints" shall mean any form of complaint, grievance,
28 objection or citation whether made directly to YOU or to any
governmental agency (i.e., State Attorney General) or non-governmental
agency (i.e., Better Business Bureau), but shall NOT include
criminal/civil matters pending in any state or federal court.

1 **RESPONSE TO RFP NO. 7:**

2
3 Responding Party objects to this request as vague, ambiguous, overbroad. In
4 particular, this request is not relevant and not likely to lead to the discovery of
5 admissible evidence, overbroad, harassing, and burdensome because the request
6 falls outside the scope of the bifurcated trial ordered by Judge Stephen V. Wilson
7 on April 19, 2010 and set for August 3, 2010. Responding Party also objects to
8 this request as calling for the disclosure, implicitly or explicitly, of information
9 protected by Plaintiffs' rights of privacy, financial privacy and rights pertaining to
10 proprietary business information, trade secret, confidential business information or
11 competitively-sensitive information. Responding Party further objects to this
12 request based on the right of privacy via statute, constitution, and common law,
13 and as calling for the disclosure of private information, including but not limited
14 to, private financial and other sensitive information, of a consumer and employee.

15 Without waiving these objections, Responding Party, after a diligent search
16 and reasonable inquiry, responds as follows: Unless Defendants narrow this
17 Request to issues relevant to the bifurcated trial or identify the statements at issue
18 to which this Request relates, Responding Party cannot respond.

19
20 **DEFENDANTS' RFP NO. 8**

- 21
22 8. Produce copies of any/all documents which YOU claim are proof that
23 YOU have been damaged by any of the specific statements identified in
24 YOUR response to Request #1 above. If NONE, so state.

25 **RESPONSE TO RFP NO. 8:**

26
27 Responding Party object to this request as vague, ambiguous, overbroad. In
28 particular, this request is not relevant and not likely to lead to the discovery of

1 admissible evidence, overbroad, harassing, and burdensome because the request
2 falls outside the scope of the bifurcated trial ordered by Judge Stephen V. Wilson
3 on April 19, 2010 and set for August 3, 2010. Responding Party also objects to
4 this request as calling for the disclosure, implicitly or explicitly, of information
5 protected by Plaintiffs' rights of privacy, financial privacy and rights pertaining to
6 proprietary business information, trade secret, confidential business information or
7 competitively-sensitive information. Responding Party further objects to this
8 request based on the right of privacy via statute, constitution, and common law,
9 and as calling for the disclosure of private information, including but not limited
10 to, private financial and other sensitive information, of a consumer and employee.

11 Without waiving these objections, Responding Party, after a diligent search
12 and reasonable inquiry, responds as follows: Responding Party will produce or
13 make available for inspection the requested documents in their possession,
14 custody, or control. In addition, Plaintiffs are still locating these specific
15 documents and will provide them to Defendants under separate cover.

16
17 **DEFENDANTS' RFP NO. 9**

- 18
19 9. Produce copies of any/all documents which YOU claim are proof that
20 YOU have been damaged by any threats made to YOU by Defendants. If
21 NONE, so state.
22
23
24

25 **RESPONSE TO RFP NO. 9:**

26
27 Responding Party objects to this request as vague, ambiguous, overbroad
28 and unintelligible to the extent that "threats" are "damag[ing]." In particular, this

1 request is not relevant and not likely to lead to the discovery of admissible
2 evidence, overbroad, harassing, and burdensome because the request falls outside
3 the scope of the bifurcated trial ordered by Judge Stephen V. Wilson on April 19,
4 2010 and set for August 3, 2010. Responding Party also objects to this request as
5 calling for the disclosure, implicitly or explicitly, of information protected by
6 Plaintiffs' rights of privacy, financial privacy and rights pertaining to proprietary
7 business information, trade secret, confidential business information or
8 competitively-sensitive information. Responding Party further objects to this
9 request based on the right of privacy via statute, constitution, and common law,
10 and as calling for the disclosure of private information, including but not limited
11 to, private financial and other sensitive information, of a consumer and employee.

12 Without waiving these objections, Responding Party, after a diligent search
13 and reasonable inquiry, responds as follows: Responding Party will produce or
14 permit inspection of the requested documents in its possession, custody, or control.
15 In addition, Plaintiffs are still locating these specific documents and will provide
16 them to Defendants under separate cover.

17
18 **DEFENDANTS' RFP NO. 10**

- 19
20 10. Produce copies of any/all documents YOU have showing that any
21 employees of AEI terminated their employment as a result of any
22 statements about YOU posted on www.RipoffReport.com.

23
24
25
26 **RESPONSE TO RFP NO. 10:**

1 Responding Party objects to this request as unduly burdensome, vague as
2 to “employee,” ambiguous, overbroad, calls for legal conclusion, misleading, not
3 relevant to any claim or defense in the bifurcated trial, and not reasonably
4 calculated to lead to the discovery of admissible evidence in the bifurcated trial.

5 Without waiving these objections, Responding Parties, after a diligent search
6 and reasonable inquiry, respond as follows: Responding parties will produce the
7 requested documents in their possession, custody, or control. In addition, certain
8 statements on Defendants’ website are responsive to this request in that the author
9 of at least one report stated that the other reports therein influenced her decisions.

10
11 **DEFENDANTS’ RFP NO. 11:**

- 12
13 11. Produce copies of any/all documents relating to any and all employees of
14 AEI who terminated their employment with AEI for any reason since the
15 inception of the company.

16 **RESPONSE TO RFP NO. 11:**

17
18 Responding Party objects to this request as unduly burdensome, vague,
19 ambiguous, overbroad, calls for legal conclusion, misleading, not relevant to any
20 claim or defense in the bifurcated trial, and not reasonably calculated to lead to the
21 discovery of admissible evidence in the bifurcated trial.

22 Without waiving these objections, certain statements on Defendants’ website
23 are responsive to this request in that the author of at least one report stated that the
24 other reports therein influenced her decisions.

25
26 **DEFENDANTS’ RFP NO. 12:**

- 27
28 12. Produce copies of any/all documents which YOU have showing that
Defendants have offered to correct the content of posts on

1 Responding Party objects to this request as unduly burdensome, vague,
2 ambiguous, overbroad, misleading, and on the ground that information needed to
3 fully respond to this request is in the possession of or equally available to the
4 propounding party.

5 Without waiving these objections, Responding Party, after a diligent search
6 and reasonable inquiry, responds as follows: Responding Party will produce any
7 requested documents in its possession, custody, or control. In addition, documents
8 found on Defendants' own website and the public record in other actions against
9 Defendants are responsive to this request.

10
11 **DEFENDANTS' RFP NO. 14:**

- 12
13 14. Produce copies of any/all documents which YOU have showing that
14 Defendants were aware of YOUR valuable contracts and business
15 expectancies prior to the publication of the reports at issue in this case. If
16 NONE, so state.

17
18 **RESPONSE TO RFP NO. 14:**

19
20 Responding Party object to this request as vague, ambiguous, overbroad. In
21 particular, this request is overbroad, harassing, and burdensome because the
22 request falls outside the scope of the bifurcated trial ordered by Judge Stephen V.
23 Wilson on April 19, 2010 and set for August 3, 2010. Discovery is ongoing and the
24 information that would lead to the discovery of responsive documents is primarily
25 or solely in the control of Defendants.

26
27 **DEFENDANTS' RFP NO. 15:**

1 15. Produce copies of all state and federal income tax returns for AEI since
2 its inception.

3
4 **RESPONSE TO RFP NO. 15:**

5
6 Responding Party objects to this request as calling for the disclosure,
7 implicitly or explicitly, of information protected by Plaintiffs' rights of privacy,
8 financial privacy and rights pertaining to proprietary business information, trade
9 secret, confidential business information or competitively-sensitive information.
10 California recognizes a privilege for tax returns. Responding Party further objects
11 to this request based on the right of privacy via statute, constitution, and common
12 law, and as calling for the disclosure of private information, including but not
13 limited to, private financial and other sensitive information, of a consumer. This
14 request is not relevant to any issue in the bifurcated trial and is not likely to lead to
15 any evidence admissible in the bifurcated trial, harassing, oppressive and
16 overbroad.

17
18 **DEFENDANTS' RFP NO. 16:**

19
20 16. Produce copies of any and all profit/loss statements relating to AEI for
21 the past five (5) years.

22 **RESPONSE TO RFP NO. 16:**

23
24 Responding Party objects to this request as calling for the disclosure,
25 implicitly or explicitly, of information protected by Plaintiffs' rights of privacy,
26 financial privacy and rights pertaining to proprietary business information, trade
27 secret, confidential business information or competitively-sensitive information.
28 Responding Party further objects to this request based on the right of privacy via
statute, constitution, and common law, and as calling for the disclosure of private

1 information, including but not limited to, private financial and other sensitive
2 information, of a consumer. This request is not relevant to any issue in the
3 bifurcated trial and is not likely to lead to any evidence admissible in the bifurcated
4 trial, harassing, oppressive and overbroad.

5
6 **DEFENDANTS' RFP NO. 17:**

- 7
8 17. Produce copies of any and all correspondence YOU have had with
9 anyone (not including attorneys) regarding:
10 a. Xcentric Ventures, LLC; or
11 b. Ed Magedson; or
12 c. www.RipoffReport.com

13 **RESPONSE TO RFP NO. 17:**

14
15 Responding Party objects to this request as calling for the disclosure,
16 implicitly or explicitly, of matters protected from discovery by the attorney-
17 client or attorney-work product privileges. Responding Party also objects to
18 this request as unduly burdensome, vague, ambiguous, overbroad, not
19 relevant to any claim or defense in the action, and not reasonably calculated to
20 lead to the discovery of admissible evidence

21 Without waiving these objections, Responding Party, after a diligent search
22 and reasonable inquiry, responds as follows: Responding Party will produce the
23 requested documents in their possession, custody, or control. In addition, exhibits
24 to Plaintiff's Complaint and other filings in this action are responsive to this
25 request.

26
27 **DEFENDANTS' RFP NO. 18:**

1 18. Produce copies of any documents YOU have in which an individual or
2 business stated their decision not to do business with YOU because of
3 statements about YOU appearing on the ROR Site. If NONE, so state.

4 **RESPONSE TO RFP NO. 18:**

5
6 Responding Party objects to this request as unduly burdensome,
7 vague, ambiguous, and overbroad, not relevant to any issue in the bifurcated
8 trial and not likely to lead to the discovery of any evidence admissible in the
9 bifurcated trial.

10 Without waiving these objections, Responding Party, after a diligent search
11 and reasonable inquiry, responds as follows: Responding Party will produce the
12 requested documents in their possession, custody, or control. In addition,
13 documents found on Defendants' own website and the public record in other
14 actions against Defendants are responsive to this request.

15
16 **DEFENDANTS' RFP NO. 19:**

17
18 19. Produce copies of any documents that establish that RAYMOND
19 MOBREZ holds a Ph.D degree or any equivalent level of education.

20
21 **RESPONSE TO RFP NO. 19:**

22
23 Responding Party objects to this request as vague, ambiguous, overbroad. In
24 particular, this request is overbroad, harassing, and burdensome because the
25 request falls outside the scope of the bifurcated trial ordered by Judge Stephen V.
26 Wilson on April 19, 2010 and set for August 3, 2010.

27 Without waiving these objections, Responding Parties, after a diligent
28 search and reasonable inquiry, respond as follows: Responding parties will
produce any requested documents in their possession, custody, or control.

1
2 **DEFENDANTS' RFP NO. 20:**

3
4 20. Produce copies of any document YOU have showing that Defendants
5 created the titles to any reports about YOU which YOU allege are false.

6
7 **RESPONSE TO RFP NO. 20:**

8
9 Responding Party objects to this request as vague, ambiguous, overbroad,
10 and calls for premature expert testimony. Responding Party also objects that this
11 request is not relevant to any issue in the bifurcated trial to the extent that the Court
12 expressly stated that evidence of truth or falsity would not be admissible in the
13 bifurcated trial.

14 Without waiving these objections, Responding Party, after a diligent search
15 and reasonable inquiry, responds as follows: Responding Party will produce the
16 requested documents in their possession, custody, or control. In addition, since
17 this trial has began, Defendants have altered the title tags and changed them.
18 Responding Party will produce documents evidencing title tags from on or about
19 April 1, 2010 before Defendants altered or changed them. In addition, documents
20 in the public record from other actions against Defendants are responsive to this
21 Request.

22
23 **DEFENDANTS' RFP NO. 21:**

24
25 21. Produce copies of any documents YOU have showing that Defendants
26 have engaged in a conspiracy to defame YOU.

27
28 **RESPONSE TO RFP NO. 21:**

1 Responding Party objects to this request as vague, ambiguous as to “trial”
2 because the trial has been bifurcated, harassing, overbroad, and impermissibly
3 compound.

4 Without waiving these objections, Responding Party responds as follows:
5 Plaintiffs are in the process of compiling such documents and will produce them in
6 accordance with the Federal Rules. Documents identified in Plaintiffs’ Rule 26(a)
7 disclosures are responsive to this Request.

8 In addition, Responding Party identifies the email exchange and telephone
9 recordings between Defendants and Plaintiffs in which Ed Magedson insisted on
10 an application to the Corporate Advocacy Program (“CAP”) as a precondition to
11 further communications as evidence of conspiracy, given the description of CAP
12 on Defendants’ website, and therefore responsive to this request. In addition,
13 documents in the public record from other actions against Defendants are
14 responsive to this Request.

15
16
17 **DEFENDANTS’ RFP NO. 22:**

18
19 22. Produce copies of any and all documents YOU intend to use at trial in
20 this matter.

21
22 **RESPONSE TO RFP NO. 22:**

23 Responding Party objects to this request as vague, ambiguous as to “trial”
24 because the trial has been bifurcated, harassing, overbroad, and calls for pre-
25 mature expert testimony, and impermissibly compound.

26 Without waiving these objections, Responding Party responds as follows:
27 Plaintiffs are in the process of compiling such documents and will produce them in
28

1 accordance with the Federal Rules. Documents identified in Plaintiffs' Rule 26(a)
2 disclosures are responsive to this Request.

3 In addition, Responding Party identifies the email exchange and telephone
4 recordings between Defendants and Plaintiffs in which Ed Magedson insisted on
5 an application to the Corporate Advocacy Program ("CAP") as a precondition to
6 further communications as evidence of conspiracy, given the description of CAP
7 on Defendants' website, and all of Defendants' website and publicly visible source
8 code as responsive to this request. In addition, documents in the public record from
9 other actions against Defendants are responsive to this Request.

10
11
12 DATED: May 26, 2010

Asia Economic Institute LLC

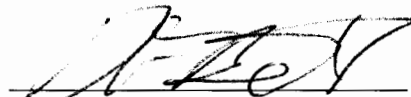
13
14 By: 

15 _____
16 DANIEL F. BLACKERT
17 LISA J. BORODKIN
18 Attorneys for Plaintiffs,
19 Asia Economic Institute LLC,
20 Raymond Mobrez, and Iliana
21 Llaneras
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

I certify that on May 26, 2010 I emailed the foregoing to:

David S. Gingras
Gingras Law Office, PLLC
david@ripoffreport.com
4073 E. Mountain Vista Drive
Phoniex, AZ 85048
Attorney for Defendants

A handwritten signature in black ink, appearing to read 'D. Blackert', written over a horizontal line.

Daniel F Blackert, Esq.