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7 Attorney for Plaintiffs,
Asia Economic Institute, LLC
8 Raymond Mobrez, and
Iliana Llaneras

9
10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**

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

14 Plaintiffs,

15 vs.

16
17 XCENTRIC VENTURES, LLC, an Arizona
LLC d/b/a as BADBUSINESSBUREAU
18 and/or BADBUSINESSBUREAU.COM
and/or RIP OFF REPORT and/or
19 RIPOFFREPORT.COM; BAD BUSINESS
BUREAU, LLC, organized and existing under
20 the laws of St. Kitts/Nevis, West Indies;
EDWARD MAGEDSON an individual, and
21 DOES 1 through 100, inclusive,

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

**ASIA ECONOMIC INSTITUTE, LLC'S
NOTICE OF DEPOSITION TO
DEFENDANT XCENTRIC VENTURES,
LLC UNDER F.R.C.P. 30(b)(6)**

The Hon. Stephen V. Wilson

Pretrial Conference: August 2, 2010
Trial Date: August 3, 2010

Deposition Date: June 2, 2010
Time: 10:00 AM
Place: Jaburg & Wilk, PC
3200 N. Central Ave.
Suite 2000
Phoenix, AZ 85012

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

Doc. 91 Att. 1

1 **PLEASE TAKE NOTICE** that, pursuant to Federal Rule of Civil
2 Procedure 30(b)(6), Plaintiff Asia Economic Institute, LLC (“AEI”), by and
3 through its attorneys, will take deposition of Defendant Xcentric Ventures, LLC
4 (“Xcentric”) upon oral examination at 10:00 a.m. on June 2, 2010 at the offices of
5 Jaburg & Wilk, 3200 N. Central Avenue, Suite 2000, Phoenix, Arizona 85012, or
6 at such place as the parties shall reasonably mutually determine. The deposition
7 will be videotaped and recorded stenographically before a certified shorthand
8 reporter duly authorized to administer oaths.

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10 The designee(s) will be examined on these topics:

- 11
- 12 1. Xcentric’s conversations with Plaintiffs.
- 13 2. The operation and management of the Corporate Advocacy Program
14 (“CAP”).
- 15 3. The persons who negotiate, set, or otherwise establish the cost of joining
16 and/or maintaining participation in CAP.
- 17 4. Xcentric’s method of establishing the cost of CAP for its participants.
- 18 5. Persons working for or on behalf of Xcentric or in partnership with Xcentric
19 to solicit participants in CAP.
- 20 6. Xcentric’s methods of soliciting participants in CAP.
- 21 7. Third parties hired, engaged, or known by Xcentric to solicit participants in
22 CAP.
- 23 8. Xcentric’s practice of recording telephone conversations.
- 24 9. Xcentric’s vendor for recording telephone conversations.
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1 DATED: May 28, 2010

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5 Daniel F. Blackert
6 Lisa Borodkin
7 Attorneys for Plaintiffs
8 Asia Economic Institute,
9 LLC, Raymond Mobrez and
10 Iliana Llaneras
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CERTIFICATE OF SERVICE

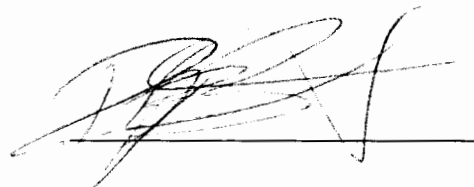
I hereby certify that on May 28, 2010 I e-mailed the foregoing to:

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Attorney for Defendants

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With a copy to follow by United States First Class mail.



Daniel F. Blackert