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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

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

vs.) Case No:

XCENTRIC VENTURES, LLC, an) 2:10-cv-01360-SVW-PJW
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, West Indies;)
EDWARD MAGEDSON, an individual,)
and DOES 1 through 100,)
Inclusive,)
Defendants.)

Videotaped Deposition of EDWARD MAGEDSON,
taken on June 8, 2010 at the offices of
Jaburg & Wilk, P.C., 3200 North Central
Avenue, Suite 2000, Phoenix, Arizona,
commencing at 10:07 a.m. before Marcella
Daughtry, RPR and Arizona Certified Reporter.

PAGES 1 - 227

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. 13:15:25

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 13:15:39
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 13:15:53
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 13:16:02
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 13:16:15

1 answer that question.

2 MS. BORODKIN: I'm going to just state
3 it for the record that plaintiffs reserve the right to
4 seek to re-depose Mr. Magedson and the Xcentric
5 Rule 30(b)(6) witness to the extent questions are not 15:46:07
6 being answered based on a potential protective order.

7 MR. GINGRAS: That objection had nothing
8 to do with a protective order.

9 THE WITNESS: Financial information
10 under California and Arizona law, something is -- I 15:46:23
11 don't think you have the right to have that
12 information.

13 MS. BORODKIN: That's okay. I'm still
14 saying, even though we may conclude today's deposition,
15 I'm not closing it in the sense that plaintiffs reserve 15:46:36
16 the right to seek to re-depose Mr. Magedson, probably
17 following the hearing on the motion to compel that has
18 been set for June 25th, to pick up answers that he's
19 not providing if there is no protective order, unless
20 Mr. Gingras would like to stipulate that we can do 15:47:07
21 that.

22 MR. GINGRAS: I won't stipulate to that,
23 and your rights are exactly the same whether you make
24 the speech that you just made or not, so I'm not going
25 to stop you from doing so. It's your seven hours. You 15:47:18