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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ASIA ECONOMIC INSTITUTE, a California
limited liability company, RAYMOND
MOBREZ, an individual, and ILIANA
LLANERAS, an individual,

Plaintiffs,

v.

XCENTRIC VENTURES, LLC, an Arizona
limited liability company, d/b/a/ as BAD
BUSINESS BUREAU and/or
BADBUSINESSBUREAU.COM, and/or RIP
OFF REPORT and/or RIPOFF
REPORT.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.

CV 10-1360 SVW (PJWx)

DECLARATION OF PETER MALLON

DECLARATION OF PETER MALLON

I, PETER MALLON, certify and declare as follows:

1. I am an attorney at law duly licensed to practice before all courts of the State of
California, and before this Court, and am employed by the Law Offices of Steven D. Hillyard,

1 APC.

2 2. I have actual knowledge of the matters stated herein and could competently testify
3 thereto, except for those matters stated on information and belief, and as to those matters, I am
4 informed and believe them to be true.

5 3. This declaration is provided to provide the Court with new information relevant to
6 claims made in the above-captioned lawsuit. I am not employed by, nor personally acquainted
7 with any party involved in this case.

8 4. I have been admitted to practice law in the State of California since 1986, and have
9 been admitted to practice by the United States District Court for the Northern, Central and Eastern
10 Districts, and the United States Court of Appeal for the Ninth Circuit. I have served as a judicial
11 arbitrator for the California Superior Courts over the past twenty (20) years in various counties,
12 including Los Angeles, San Francisco and Marin. I have had an "AV" Peer Rating from
13 Martindale Hubbell (the highest rating attainable) for approximately the past ten (10) consecutive
14 years. I have never been subject to any State Bar disciplinary proceeding, have never had a claim
15 for legal malpractice asserted against me or any associates working under me, and have never been
16 a party to an attorney-client fee dispute. My practice has specialized in civil litigation since I was
17 first admitted to practice in 1986, and my primary practice area is general casualty defense.

18 5. On July 22, 2010, at approximately 3:30 p.m., I was sitting in my office when my
19 secretary, Karen Merick, received a telephone call from an individual named Trent Swain, who
20 identified himself as being from "Quick Rep Repair". Ms. Merick got my attention, and motioned
21 for me to walk over to her desk so I could hear the conversation and see the notes she was
22 scribbling down. Ms. Merick asked the caller to identify himself and his company again, and Mr.
23 Swain gave her a telephone number at which he could be contacted, namely 888-610-6976. Mr.
24 Swain then asked out of the blue whether our law firm has a website. We do not, and Ms. Merick
25 so advised Mr. Swain. He then advised Ms. Merick that a derogatory report had been posted
26 about me and our firm on the internet, which is prominently displayed in response to Google
27 searches for "HDMLAW.COM". (This is the Domain for the firm's email.) Mr. Swain then
28 stated that his company could "help us" undo the damage caused by the negative internet posting

1 about me for a fee, and Ms. Merick suggested that he speak with Mr. Hillyard. Mr. Swain left a
2 telephone message for Mr. Hillyard, essentially repeating the same information set forth above.

3 6. I immediately conducted a Google search for "HMDLAW.COM" and found a link
4 to an outrageous, defamatory "Report" about me dated July 11, 2010, on a website called
5 "RipoffReport.com". The "Report" contains nothing but derogatory slurs about me, referring to
6 me as "incompetent", "slimy", and that I make my firm "look like whores". It states, falsely, that I
7 am not respected in the legal community. An "update" to the "report" states "watch your pockets,
8 the billing rate is terrible..." The "report" also appears in response to Google searches for my
9 name. A true and correct copy of the "report" is attached hereto as Exhibit "A".

10 7. On July 22, 2010, Mr. Swain called my office two additional times in an effort to
11 sell his reputation repair services to me or Mr. Hillyard. I did not return Mr. Swain's calls on that
12 day, nor did Mr. Hillyard (who was out of the office).

13 7. On July 23, 2010, I received a fax from another company called
14 "ReputationRepairServices.com", also offering its fee services to repair the harm to my reputation
15 caused by the posting on RipoffReport.com about me. A true and correct copy of this fax is
16 attached hereto as Exhibit "B", inclusive of a screen shot from a Google search of my name that
17 was provided as part of the fax showing the link to Ripoffreport.com.

18 8. On July 23, 2010, I returned the call from Mr. Swain to obtain information about
19 Quick Rep Repair's services. I spoke with Mr. Pat Kennedy of San Diego, California, who
20 identified himself as the business partner of Mr. Swain. He advised me that it would cost a
21 minimum of \$2,995 for me to retain their services for one month to commence work to repair my
22 reputation. He told me that the owner of RipoffReport.com is generally in hiding to avoid service
23 of lawsuits against him, and that RipoffReport.com refuses to remove postings no matter how
24 reckless or defamatory in nature, such as the one posted about me.

25 9. I have spent the past 23 years working hard to establish an excellent reputation for
26 myself. The recklessly defamatory and malicious statements now appearing on
27 Ripoffreport.com's website have caused my hard earned reputation irreparable harm.

28 10. While I have not had time since yesterday to familiarize myself fully with the

1 issues raised by plaintiff's complaint in this case, based upon my experience over the past 48
2 hours it is my strong belief that the Honorable Court should exercise its power to order injunctive
3 relief as prayed for by plaintiffs, requiring Ripoffreport.com to remove all unverified defamatory
4 "reports" from its website, and such other relief as is appropriate to curtail its ability to facilitate
5 costly reputation destruction by anonymous posters and by Ripoffreport.com.

6

7 I declare under penalty of perjury under the laws of the United States of America, that the
8 foregoing is true and correct. Executed this 23rd day of July, 2010 at San Francisco, California.

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PETER MALLON

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EXHIBIT “A”

...by consumers, for consumers ...scams, consumer complaints, and frauds reported. File a report, post your review or experience!



Register to File a Report | Login | Help

Don't let them get away with it.® Let the truth be known!

HOME



SEARCH COMPANY OR REPORT # [input] [Search]
Use Advanced Search Latest Reports

Use our complaint form to report a scam. Site problems? Use our support form.
Read "Thank You" e-mails from consumers...Ripoff Report protects consumer's right to speak out.

Report: #622177

Report: Law Offices of Steven D. Hillyard, "Attorney Peter Mallon" "HDMLaw.com"

Reported By: John d (oakland California) U.S.A.



Law Offices of Steven D. Hillyard, "Attorney Peter Mallon" "HDMLaw.com" "Peter Mallon Esq.", Pro-Business law firm that in my opinion hires incompetent lawyers such as Peter Mallon San Francisco, California

*UPDATE by author... Regarding "Law offices of Steven D. Hillyard"

Law Offices of Steven D. Hillyard, "Attorney Peter Mallon" "HDMLaw.com"
345 California Street, #1770
San Francisco California 94104
United States of America
Phone:
Web Address: www.hdmlaw.com

Category: Attorneys & Legal Services

Submitted: Sunday, July 11, 2010
Last posting: Saturday, July 17, 2010

Report & Rebuttal:
2 Author 0 Consumer 0 Employee
Respond to this report!
File a Rebuttal
Victim of this person/company?
File a Report



Peter Mallon is a dirty slimy attorney who is an incompetent. He reacts off emotion and defends his client in a way that makes the firm look like they are whores. Taking up any lawsuit to make money. If I were them and this is my opinion (constitutional right) to speak freely should fire him and send him to the EDD line. He absolutely sucks at his job and in my opinion is not respected in the legal community.



Do-it-yourself guide
Ripoff Report
Ripoff Report verified & safe
Get An Econoline Pool For As Low As \$299!
Victim of a Rip-off? Don't get mad get revenge!

Video Spotlight

- Data recovery scams over charge and steal private data from broken hard drives.
Loan modification offers risk for those facing foreclosure. Don't pay up front!
Questionable pyramid scheme takes advantage of consumers.
Companies steal from your bank account. Find out how.
Fox 11 Los Angeles - Rip Off Report Redux
WBZ - Be Wary of Door-to-Door Scams

How Much Dues is This Costing You?
www.truthfornurses.com
Paid for by Meg Whitman for Governor 2010

[Click Here to read other Ripoff Reports on Law Offices](#)

Search for additional reports

If you would like to see more Rip-off Reports on this company/individual, search here:

Law Offices [SEARCH TIPS](#)

Report & Rebuttal:

Respond to this report!

?

Victim of this person/company?

?

Repair Your Reputation

?



If You Make Less Than \$45k/Year, You May Qualify For A Grant To Go Back To School



Click Your State

AL	AK	AZ	CA	CO
CT	DE	DC	FL	GA
HI	ID	IL	IN	IA
KS	KY	LA	ME	MD
MA	MI	MN	MS	MO
MT	NE	NV	NH	NJ
NM	NY	NC	ND	OH
OK	OR	PA	RI	SC
SD	TN	TX	UT	VT
VA	WA	WV	WI	WY

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[Ripoff Report Legal Directory](#)



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Updates & Rebuttals:

REBUTTALS & REPLIES:

2 Author 0 Consumer 0 Employee

#1 Update By Author Regarding "Law offices of Steven D. Hillyard"
John d - richmond (U.S.A.)

Respond to this report!
 ?

SUBMITTED: Saturday, July 17, 2010
Watch your pockets, the billing rate is terrible and you won't even get a zealous defense

POSTED: Saturday, July 17, 2010

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- | [Thank You Emails!](#) | [Corporate Advocacy Program: How to repair your business reputation.](#) | [Ed Magedson - Ripoff Report Founder](#) |

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EXHIBIT “B”

FAX

Date: 7/23/2010

Pages including cover sheet: 3

To:	+14153346967
Phone	
Fax Number	+14153346967

From:	William Stanley
	Embedded Enterprises
	9226 Jollyville
	Austin
	TX 78759
Phone	(888) 256-4616 * 101
Fax Number	(888) 256-4616

NOTE:

Attorney Peter Mallon

ReputationRepairServices.com

Bill Lawrence
Telephone 512-275-6123

July 23, 2010

Attn : **Attorney Peter Mallon**

I want to inform you that recently a derogatory comment was posted to the Google search under your listing.

Postings whether true or impact the dollars you spend to promote your practice on the internet.

I represent a company that can provide a solution for this problem. For more information you can contact me by phone: 512-275-6123. To find out more about the cost effective service we offer visit our website at www.ReputationRepairServices.com.

It is in your best interest to address this problem as soon as possible. Every time someone clicks on that derogatory false will affect how new prospective clients view your business. The postings link the link has the potential to move-up in the listing. Eventually it could be the listing right under your listing and becomes more difficult to resolve.

Thank you for your attention

Bill Lawrence

website: www.ReputationRepairServices.com

Attorney Peter Mallon - Google Search - Mozilla Firefox

File Edit View History Bookmarks Tools Help

http://www.google.com/#hl=en&q=Attorney+Peter+Mallon&fp=6a930dd42f5b017

Customer Relationship Management Attorney Peter Mallon - Google S Gmail - Compose Mail - defendfax@gmail.com

Web Images Videos Maps News Shopping Gmail more v

defendfax@gmail.com | Web History | Settings v | Sign out



Attorney Peter Mallon

Search

About 438,000 results (0.16 seconds)

Advanced search

Everything

More

All results

Wonder wheel

More search tools

Peter Mallon - Directory | LinkedIn

Peter Mallon. Title: **Attorney** at Law at Law Offices of Steven D. Hillyard APC, Demographic info: Legal Services | San Francisco Bay Area ...
www.linkedin.com/subdir/PeterMallon - Cached

Peter Mallon - LinkedIn

San Francisco Bay Area - **Attorney** at Law at Law Offices of Steven D. Hillyard APC
Peter Mallon **Attorney** at Law at Law Offices of Steven D. Hillyard APC. San Francisco Bay Area. Contact **Peter Mallon** - Add **Peter Mallon** to your network ...
www.linkedin.com/pub/peter-mallon/11115621 - Cached

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Lawyer **Peter Mallon** - San Francisco, CA **Attorney** - Justia Lawyer ...

San Francisco, CA - **Peter Mallon** - Business Law, Insurance Bad Faith, insurance Defense - Justia Lawyer Directory.
lawyers.justia.com/lawyer/peter-mallon-38359 - Cached

Law Offices of Steven D. Hillyard, "**Attorney Peter Mallon**" "HDLAW ...

Jul 11, 2010 ... **Peter Mallon** is a dirty slimy **attorney** who is an incompetent. He reacts off emotion and defends his client in a way that makes the firm look ...
www.rpofirispot.com/attorneys.../law-offices-of-steven-d-hilly-62ee.htm - Cached

Peter Mallon's Public Profile

Peter Mallon's Public Profile on Plaxo. Plaxo helps members like **Peter Mallon** keep in ...
Law Offices of Steven D. Hillyard, APC / **Attorney**. 2003 - Present ...
www.plaxo.com/directory/profile/21904396026Efc6c4b45c/PeterMallon

Attorneys & Legal Services complaints | BizClaims - latest scams ...

Peter Mallon is a dirty slimy **attorney** who is an incompetent. He reacts off emotion and defends his client in a way that makes the firm look like they are ...
www.bizclaims.com/Companyattorneys-legal-services/

Stepping into Wellness - Testimonials

Peter Mallon, **Attorney**, "went to see Jemie for a diff. type deal with handle realted