

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION
Case No. 07-22670 CIV-SEITZ/MCALILEY

STOCKWIRE RESEARCH GROUP, INC., a
Florida corporation and ADRIAN JAMES, a Texas
resident,

Plaintiffs,

v.

JONATHAN LEBED, a Florida resident, LEBED
BIZ, L.L.C., a New Jersey Limited Liability
Company, PIGASA, INC., a New Jersey
Corporation and CONSTANCE LEBED, a New
Jersey resident,

Defendants.

CROSS-NOTICE OF HEARING
(20 Minutes- Discovery Calendar)

PLEASE TAKE NOTICE that the undersigned will call up for hearing before the
Honorable Magistrate Judge John J. O'Sullivan, in the United States District Court, Southern
District of Florida, U.S. Courthouse, **300 N.E. 1st Avenue, South Courtroom, Room 203,**
Miami, Florida 33132, on **Thursday, May 1, 2008 at 10:00am**, or as soon thereafter as counsel
may be heard.

THE SUBSTANCE OF THE DISCOVERY MATTER TO BE HEARD

1. On or about March 18, 2008, Defendant Constance Lebed received over 1500 pages
of documents related to Plaintiffs' Initial Disclosures.

2. The bulk of the documents, approximately 1,400 pages, are highly technical log files (“Log Files”) provided to Plaintiff by CIHost, Inc. on or about November 9, 2007.

3. The Log Files are indecipherable to a lay person as a trier of fact. Attached as an example are two pages of the 1,400.

4. Defendant Constance Lebed is unclear about how to interpret the Log Files given the requirements that initial disclosures are supposed to provide information that Plaintiffs claim support its position, but the Initial Disclosures do not or cannot be interpreted.

PLEASE GOVERN YOURSELF ACCORDINGLY

Dated: April 23, 2008

Respectfully Submitted,

s:/.Susan H. Aprill
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CERTIFICATE OF GOOD FAITH

WE HEREBY CERTIFY that a good faith effort has been made by counsel for the Defendant Constance Lebed prior to the filing of the cross-notice of hearing on this motion, as to all the issues set forth in the above referenced notice but was unable to resolve the issue.

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2008 the foregoing document was electronically filed with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

s:/Susan H. Aprill

SERVICE LIST

Stockwire Research vs. Lebed
CASE NO. 07-22670 CIV-SEITZ/O'SULLIVAN
U.S. DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA

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