

## **EXHIBIT 2**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GEORGE S. MAY INTERNATIONAL	)	
COMPANY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 04 C 6018
	)	
XCENTRIC VENTURES, LLC, <i>et al.</i> ,	)	Honorable Judge Norgle
	)	Magistrate Judge Mason
Defendants.	)	

**DECLARATION OF MARIA CRIMI SPETH  
IN SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

MARIA CRIMI SPETH states the following:

1. My name is Maria Crimi Speth. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court I could and would truthfully testify to the following information based upon my own personal knowledge.

2. I am an attorney licensed to practice law in the State of Arizona, I am an active member in good standing of the State Bar of Arizona, I have been admitted to practice law continuously in this state for the past 18 years, and I am admitted to practice *Pro Hac Vice* in this matter on behalf of Defendants XCENTRIC VENTURES, L.L.C. and ED MAGEDSON ("Xcentric").

3. I am currently employed as a partner in the law firm of Jaburg & Wilk P.C. in Phoenix, Arizona, and I have represented Defendants in connection with this matter since its inception. I have possession of Defendants' files in this matter, and I am personally familiar with the contents of the file.

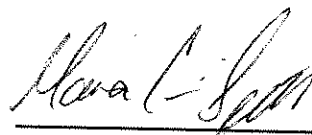
4. During the course of this lawsuit, on behalf of Defendants I requested that Plaintiff GEORGE S. MAY INTERNATIONAL COMPANY (“GSMIC”) produce copies of any/all documents showing the “false and deceptively misleading statements” at issue in this case.

5. In response to that request, GSMIC produced ninety seven (97) pages of documents, all of which were printouts of pages from the Rip-Off Report website, bearing Bates Nos. GSMIC 0001—0097 which are attached to the Declaration of Ed Magedson as Exhibit A.

6. Other than these documents and the statements contained therein, I am not aware of any other specific statements about GSMIC that GSMIC has claimed are false and has accused Defendants of publishing about it.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 19, 2006.



\_\_\_\_\_  
Maria Crimi Speth

**EXHIBIT 3**

AFFIDAVIT OF KIM JORDAN

KIM JORDAN being first duly sworn upon her oath hereby deposes and says:

1. My name is Kim Jordan. I am a resident of the State of ~~Arizona~~ <sup>New Mexico</sup> *KJD*, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the Spring of 2006.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

**WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-14-06

*Kimberly D. Jordan*  
KIM JORDAN

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012



**EXHIBIT 4**

**AFFIDAVIT OF PAULETTE GRIFFITH**

PAULETTE GRIFFITH being first duly sworn upon her oath hereby deposes and says:

1. My name is Paulette <sup>K.</sup> Griffith. I am a resident of the State of <sup>(JPG) NEW MEXICO</sup> ~~Arizona~~, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since <sup>(JPG) August</sup> the Spring of 2006.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as **Exhibit A** bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

**WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-19-2006

*Paulette K. Griffith*  
PAULETTE GRIFFITH

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012



**EXHIBIT 5**

AFFIDAVIT OF AMY THOMPSON

AMY THOMPSON being first duly sworn upon her oath hereby deposes and says:

1. My name is Amy Thompson. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the spring of 2005.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as Exhibit A bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

**WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12/14/2006

  
AMY THOMPSON

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012

**EXHIBIT 6**

**AFFIDAVIT OF HEATHER DORTON**

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HEATHER DORTON being first duly sworn upon her oath hereby deposes and says:

1. My name is Heather Dorton. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. (“Xcentric”) as a content monitor. I have worked in this position since the fall of 2004.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com (“Rip-Off Report”).

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as **Exhibit A** bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

**WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: Dec. 14, 2006

  
HEATHER DORTON

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012

**EXHIBIT 7**

**AFFIDAVIT OF JACKIE WYNNE**

JACKIE WYNNE being first duly sworn upon her oath hereby deposes and says:

1. My name is Jackie Wynne. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the summer of 2004.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as **Exhibit A** bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

**WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-15-06

  
\_\_\_\_\_  
JACKIE WYNNE

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012

**EXHIBIT 8**

**AFFIDAVIT OF G. YOUNG**

G. YOUNG being first duly sworn upon her oath hereby deposes and says:

1. My name is G. Young. I am a resident of the State of Arizona, am over the age of 18 years, and if called to testify in court in this matter I could and would truthfully testify to the following facts based upon my own personal knowledge.

2. I am currently employed by XCENTRIC VENTURES, L.L.C. ("Xcentric") as a content monitor. I have worked in this position since the summer of 2003.

3. In my job as a content monitor, I am responsible for reviewing new postings that are submitted to the website www.RipoffReport.com ("Rip-Off Report").

4. My job is to remove the following information from new postings: personal financial information, credit card numbers, bank account numbers, social security numbers, obscenities, and threats of violence.

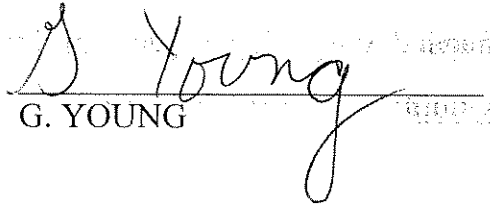
5. Except as described in the previous paragraph, I am not permitted to, nor do I, change or add any content to (1) any posting; (2) any title or heading of any posting; and/or (3) any other part of the Rip-off Report website.

6. I am aware that George S. May International Company has filed a lawsuit against Xcentric and others in which it has been alleged that Xcentric created or authored those certain reports which are attached to the affidavit of ED MAGEDSON as **Exhibit A** bearing Bates Nos. GSMIC 0001—0097.

7. I have personally reviewed these reports and I know that I did not create them or any part of them, nor do I have any information that such reports may have been created by another employee or agent of Xcentric.

**WITNESSETH** I have read the foregoing Affidavit and I declare under penalty of perjury that the facts stated therein are true and correct as of the date this Affidavit was sworn.

DATED: 12-14-06

  
G. YOUNG

JABURG & WILK, P.C.  
ATTORNEYS AT LAW  
3200 NORTH CENTRAL AVENUE  
SUITE 2000  
PHOENIX, ARIZONA 85012