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5634-2-51

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GEORGE S. MAY INTERNATIONAL)
COMPANY,)

Plaintiff,)

v.)

XCENTRIC VENTURES, LLC, RIP-OFF)
REPORT.COM, BADBUSINESSBUREAU.COM,)
ED MAGEDSON, VARIOUS JOHN DOES, JANE)
DOES AND ABC COMPANIES,)

Defendants.)

Case No. 04 C 6018

Honorable Judge Norgle

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CLERK, U.S. DISTRICT COURT

**SUPPLEMENT TO DEFENDANTS' RESPONSE TO GEORGE S. MAY
INTERNATIONAL COMPANY'S MOTION TO ENFORCE COURT'S
JUNE 9, 2005 ORDER GRANTING PLAINTIFF'S MOTION TO
COMPEL AND MOTION FOR SANCTIONS UNDER FRCP 37(b)**

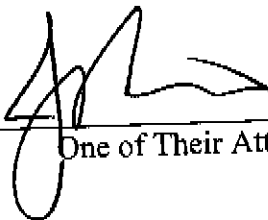
Defendants, Xcentric Ventures, LLC and Ed Magedson, by and through their attorneys, hereby submit their supplement to Plaintiff's response to motion to enforce and for sanctions.

Due to a miscommunication between Defendants' counsel, Defendants inadvertently omitted to providing certain information to Plaintiff. Attached hereto is the Declaration of David S. Gingras, counsel for Defendants, which clearly explains the nature of the miscommunication between him and Defendants' counsel, Maria Crimi Speth. Mr. Gingras explains the nature of the miscommunication and includes the information that should have been provided to the Plaintiff.

WHEREFORE, Defendants Xcentric Ventures, LLC and Ed Magedson request that this Court deny the Motion to Enforce as moot. Excepting only the home addresses and last names of its employees, Xcentric has already produced full and complete responses to each and every specific category of things set forth in Plaintiff's initial Motion to Compel.

XCENTRIC VENTURES, LLC and ED MAGEDSON

By: _____



One of Their Attorneys

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GEORGE S. MAY INTERNATIONAL)
COMPANY,)

Plaintiff,)

v.)

XCENTRIC VENTURES, LLC, RIP-OFF)
REPORT.COM, BADBUSINESSBUREAU.COM,)
ED MAGEDSON, VARIOUS JOHN DOES, JANE)
DOES AND ABC COMPANIES,)

Defendants.)

Case No. 04 C 6018

Honorable Judge Norgle

**DECLARATION OF DAVID S. GINGRAS IN SUPPORT OF
DEFENDANT'S SUPPLEMENTAL RESPONSE TO GEORGE S. MAY
INTERNATIONAL COMPANY'S MOTION TO ENFORCE COURT'S JUNE 9, 2005
ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL AND MOTION FOR
SANCTIONS UNDER FRCP 39(b)**

State of Arizona)
) ss.
County of Maricopa)

DAVID S. GINGRAS being duly sworn upon his oath hereby deposes and says:

1. My name is David Scott Gingras. 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 States of Arizona and California, and I am a member in good standing of the State Bars of Arizona and California. I am currently employed as an associate attorney with the law firm of Jaburg & Wilk P.C. in Phoenix Arizona, and since approximately late June or early July 2005, I

have assisted attorney Maria Speth in representing Defendant XCENTRIC VENTURES, LLC ("Xcentric") in the litigation pending in this court.

3. Based on my conversations with Ms. Speth and with counsel for the Plaintiff, Rachel Kindstrand, I am aware that there is presently a discovery dispute between the parties relating to certain documents and things which Plaintiff has asked Xcentric to produce relating to the issue of whether this Court possesses personal jurisdiction over Xcentric.

4. Among other things, Ms. Speth requested that I assist her with coordinating and preparing our clients responses to Plaintiff's outstanding discovery requests. In that regard, I spoke to Ms. Kindstrand via telephone and email on several occasions, and in the process of doing so I also disclosed certain documents and information to Ms. Kindstrand pursuant to this Court's order granting Plaintiff's Motion to Compel. Among other things, I understand that Ms. Kindstrand had requested that Xcentric disclose a list of all books sold to any persons located in the State of Illinois.

5. Last month, on or around August 11, 2005, Ms. Speth provided me with a list, a copy of which is attached hereto as Exhibit A, which I understand contains a list of books sold to individuals in Illinois. It is my understanding that these books were not sold by Xcentric, but rather by a different company which advertises the books for sale through Xcentric's website, www.ripoffreport.com.


6. At the time I received this list from Ms. Speth, I did not speak with her at length about it, but I understood that she was giving me the list simply for my information and that she had already disclosed the list to Ms. Kindstrand pursuant to this Court's order.

7. Later, I learned that Ms. Kindstrand had filed a motion to enforce this Court's prior order and for sanctions. In course of responding to that motion, Ms. Speth explained her belief that the list attached hereto had, in fact, previously been disclosed to Ms. Kindstrand. After meeting and conferring with me about the list, Ms. Speth and I

discovered that we had misunderstood each other at the time she gave me the list. My understanding was, as I have noted above, that Ms. Speth had already disclosed the list and that she was simply passing it to me for my information. However, Ms. Speth has informed me that her belief was that at the time she gave the list to me, she specifically told me that she had not yet disclosed the list to Ms. Kindstrand and that she wanted me to do so as soon as possible.

8. In any event, I misunderstood Ms. Speth's instructions to me, and for that reason, I did not disclose the attached list to Ms. Kindstrand. If I had not misunderstood Ms. Speth's intent, I could and would have promptly disclosed the list the same day I received it.

9. **WITNESSETH** I have read the foregoing Affidavit and know of my own personal knowledge that the facts stated therein are true and correct as of the date this Affidavit was sworn. I swear the foregoing to be true and correct under penalty of perjury of the laws of the State of Arizona and of the United States.


David S. Gingras

SUBSCRIBED AND SWORN to before me this 2nd day of September 2005 by David S. Gingras who is personally known to me or whose identity was established to me by satisfactory proof.


NOTARY PUBLIC

My Commission _____



Exhibit A

12/31/2003	Kandy Blac	21.95 317 N Elmwood Ave	Wood Dale IL	60191 United Stat
1/15/2004	mary ruhlei	21.95 634 Columbia Ave.	Elgin IL	60120-390 United Stat
1/23/2004	Dawn Brev	21.95 12004 Fourth Ave.	Hebron IL	60034 United Stat
1/30/2004	Edward Ha	21.95 14156 S. Cicero Aveni	Crestwood IL	60445 United Stat
2/12/2004	FRANK GF	21.95 10004 MAIN ST	ROSCOE IL	61073 United Stat
2/13/2004	Beverly Sh	21.95 8136 S Winchester Av	Chicago IL	60620 United Stat
3/15/2004	Clifford Hul	21.95 16 DeNovion Ct.	Cahokia IL	62206 United Stat
4/1/2004	A.C.P., Inc	21.95 6806 W. 93rd Street	Oak Lawn IL	60453 United Stat
4/26/2004	Sandra We	21.95 12851 Hawks Bill Driv	Plainfield IL	60544 United Stat
4/28/2004	dale meyer	21.95 122 elliot	collinsville IL	62234 United Stat
5/1/2004	SYLVIA JC	21.95 1350 AUR(ATTN:REC	NAPERVIL IL	60540 United Stat
5/5/2004	Andrew Ma	21.95 506 E. Browning St.	Marion IL	62959 United Stat
5/7/2004	Abundance	21.95 281 Harding St.	Grayslake IL	60030 United Stat
5/10/2004	richard lew	21.95 1353 calamus lane	grayslake IL	60030 United Stat
6/4/2004	shannon hi	21.95 8929 w. bruns rd.	monee IL	60449 United Stat
6/15/2004	Lauren Gri	21.95 5419 W.129th PL	Crestwood IL	60445 United Stat
6/21/2004	BEVERLY	21.95 8143S. EVANS	CHICAGO IL	60619 United Stat
6/24/2004	scott smith	21.95 3340 susan circle sout	park city IL	60085 United Stat
6/27/2004	William Sic	21.95 13837 Ladybar Ln.	Orland Par IL	60467 United Stat
7/7/2004	Robert Ker	21.95 32 Lakeview Ave	Mundelein IL	60060 United Stat
7/11/2004	Cheryl Hall	21.95 2211 Elizabeth Avenur	Zion IL	60099 United Stat
7/17/2004	KAREN OL	21.95 242 PINE LN	BENSENV IL	60106 United Stat
7/30/2004	larry campf	21.95 1307 berkenshire lane	elk grove v IL	6E+08 United Stat
7/31/2004	Andrew Ma	21.95 235 Fencf	Hillside IL	60162 United Stat
8/3/2004	Jeff Counc	21.95 2906 Twin Falls Dr.	Plainfield IL	60544 United Stat
8/8/2004	Pete Castil	21.95 197 Uteg S 101-A	Crystal Lak IL	60014-728 United Stat
8/17/2004	Jackie Ros	21.95 185 Lake Drive South	Algonquin IL	60102 United Stat
9/19/2004	John Lope;	21.95 256 S Aldine Ave	Elgin IL	60123-724 United Stat
10/24/2004	Linda Bach	21.95 3711 Burton Trail	Crystal Lak IL	60014 United Stat
11/2/2004	Laraine Hri	21.95 c/o Winstoi 35 W. Wac	Chicago IL	60601 United Stat
11/16/2004	Natalya Ka	21.95 950 Dunham Ln.	Buffalo Gr IL	60089 United Stat
11/23/2004	GARY DA\	21.95 P.O. BOX 7505	CHICAGO IL	60680 United Stat
12/6/2004	Benjamin h	21.95 10642 Fuesser rd.	Mascoutah IL	62258 United Stat
12/7/2004	Henry Tuta	21.95 6767 N. Mi Suite 207	Niles IL	60714 United Stat
12/18/2004	Janie Turn	21.95 1648 N 21st ST	Springfield IL	6.27E+08 United Stat
12/21/2004	Linda McG	21.95 234 Bayshore Drive	Lake Bluff IL	60044 United Stat
1/5/2005	Patrick Cui	21.95 11761 Winding Trails I	Willow Spril IL	60480 United Stat
1/26/2005	Tiana Lonc	21.95 1550 N LAKE SHORE	CHICAGO IL	60610 United Stat
2/16/2005	Michael Th	21.95 960 N. Racine Ave.	Chicago IL	60622 United Stat
2/21/2005	Joyce Gulk	21.95 P.O. box 1342	Granite Cit IL	62040 United Stat
3/1/2005	EJ Batacar	21.95 6319 W Cuyler ave	Chicago IL	60634 United Stat
3/1/2005	EJ Batacar	21.95 6319 W Cuyler ave	Chicago IL	60634 United Stat
3/25/2005	JOHN M JI	21.95 1431 N. KOSTNER	CHICAGO IL	60651-160 United Stat
4/4/2005	Brian Colvi	21.95 6541 N Ric apt 1	Chicago IL	60645 United Stat
4/9/2005	Ben Fergu:	21.95 5340 S. Hs Apt 3	Chicago IL	60615 United Stat
4/26/2005	Paula Bow	21.95 4500 E. River Rd Lot ;	Ridott IL	61067 United Stat
4/28/2005	Misty Coryl	21.95 2215 Ridgefield Drive	Belvidere IL	61008 United Stat
5/1/2005	Stacey Bro	21.95 132 Fair St.	Carmi IL	62821 United Stat
5/14/2005	John Griffir	21.95 38 Meadowview Lane	Chatham IL	62629 United Stat
5/24/2005	Robert Ber	21.95 9333 N Mil c/o The Br	Niles IL	60714 United Stat
7/6/2005	lorena robir	21.95 8735 south beverly avi	chicago IL	60620 United Stat
7/8/2005	Katalin Cze	21.95 4219 Clearwater Lane	Naperville IL	60564 United Stat

7/12/2005	Charles Sc	21.95	809 Hyde Park Lane	Naperville IL	60565	United Stat
7/15/2005	Thrifty Tra	21.95	PO Box 1515	Wheaton IL	60189	United Stat
7/25/2005	dandemp	21.95	P.O. Box 913	Round Lak IL	60073	United Stat
7/30/2005	sharon ma	21.95	1008 w hovey	normal IL	61761	United Stat
8/7/2005	Jimmy Ban	21.95	3127 n., Cedar st.	Mornence IL	60954	United Stat
8/10/2005	richard win	21.95	1530 demp apt. 209	mount proe IL	60056	United Stat