

EXHIBIT 1

BOSTWICK & JASSY LLP

GARY L. BOSTWICK, Cal. Bar No. 79000

gbostwick@bostwickjassy.com

JEAN-PAUL JASSY, Cal. Bar No. 205513

jpjassy@bostwickjassy.com

KEVIN L. VICK, Cal. Bar No. 220738

kvick@bostwickjassy.com

12400 Wilshire Boulevard, Suite 400

Los Angeles, California 90025

Telephone: 310-979-6059

Facsimile: 310-314-8401

THOMAS & LOCICERO PL

JAMES J. MCGUIRE, *admitted pro hac vice*

jmcguire@tlolawfirm.com

DEANNA K. SHULLMAN, *admitted pro hac vice*

dshullman@tlolawfirm.com

400 N. Ashley Drive, Suite 1100

Tampa, Florida 33602

Telephone: 813-984-3062

Facsimile: 813-984-3070

Attorneys for Defendant

INVESTORSHUB.COM, INC.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

KENNETH EADE,

Plaintiff,

v.

INVESTORSHUB.COM, INC., a
Florida corp., DOE 1, aka NO
DUMMY, DOE 2, aka JANICE
SHELL, DOE 3, aka FASTER183,
DOE 4, aka STOCK MAVIN, DOE 5,
aka RENEE, DOE 6, aka VIRTUAL
DREW, DOE 7, aka BOB 41, DOE 8
aka OVERACHIEVER, DOE 9, aka
DOBERMAN, and DOE 10,

Defendants.

Case No. CV11-01315 JAK (CWx)

**NOTICE OF EXAMINATION OF KENNETH
EADE PURSUANT TO MARCH 26, 2012
COURT ORDER; REQUEST FOR
PRODUCTION OF DOCUMENTS AND
THINGS, AND DECLARATION OF KEVIN L.
VICK IN SUPPORT THEREOF**

Date: June 21, 2012

Time: 10:00 a.m.

Location: Bostwick & Jassy LLP
12400 Wilshire Blvd., Ste. 400
Los Angeles, CA 90025

1 **TO PLAINTIFFS AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 21, 2012, at 10:00 a.m., Defendant
3 InvestorsHub.com, Inc. will take the debtors examination upon oral examination of Plaintiff
4 Kenneth Eade pursuant to the Court's March 26, 2012 Order. The examination will take place at
5 Bostwick & Jassy LLP, 12400 Wilshire Boulevard, Suite 400, Los Angeles, California 90025. The
6 examination will continue from day-to-day until completed, unless the parties agree otherwise. This
7 examination will be taken under oath, before a certified shorthand reporter. The examination may
8 be stenographically recorded by a machine using instantaneous "real time" transcription.

9 Dated: June 1, 2012

BOSTWICK & JASSY LLP

10
11 By



12
13 KEVIN L. VICK
14 Attorneys for Defendants
15 InvestorsHub.com, Inc.
16
17
18
19
20
21
22
23
24
25
26
27

REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS PURSUANT TO THE
MARCH 26, 2012 COURT-ORDERED EXAMINATION OF KENNETH EADE

Pursuant to the Court's March 26, 2012 Order, Defendant InvestorsHub.com, Inc. ("Defendant") hereby requests that Plaintiff Kenneth Eade produce for inspection and copying on or before June 21, 2012 at 10:00 a.m. in the offices of Bostwick & Jassy, 12400 Wilshire Boulevard, Suite 400, Los Angeles, California 90025, each of the documents or tangible things described below, and further requests that Eade serve on Defendant at the same time a written response to each Request for Production set forth below, subscribed to under oath.

DEFINITIONS AND INSTRUCTIONS

The following definitions apply to the Requests for Production set forth below:

"DOCUMENTS" means a writing, as defined in California Evidence Code Section 250, and includes the original or a copy of handwriting, typewriting, printing, photostating, photographing, and every other means of recording upon any tangible thing and form of communicating or representation, including emails, letters, reports, pictures, sounds, or symbols, information stored on a data storage device or equipment, or combinations of them;

"YOU", "YOUR" or "EADE" means Plaintiff KENNETH EADE.

"EADE ENTITIES" means any entity in which YOU HOLD or maintain a financial interest.

"FINANCIAL INSTITUTIONS" means a state, national or foreign bank, state, federal or foreign savings and loan association or credit union, security dealer, or like organization, and includes a corporation engaged in a safe deposit business;

"HELD" or "HOLD" means in the possession, custody or control of YOU and/or EADE ENTITIES and/or an asset in which YOU and/or EADE ENTITIES own an interest.

1 To the extent that you are unable to comply with any Request for Production, you are
2 requested to set forth, in your written response, the reason for your inability to comply and the
3 name and address of any natural person or organization known or believed by you to have
4 possession, custody or control of the item(s) demanded.

5 To the extent you object to the production of any requested document, you are requested
6 to identify each such document with particularity and to clearly set forth the extent of, and the
7 specific ground for, your objection in your written response.

8
9 **REQUESTS FOR PRODUCTION**

10 Demands for documents to be produced pursuant to the March 26, 2012 Court-Ordered
11 Examination:

12 (1) All DOCUMENTS evidencing savings accounts held by YOU, at any
13 financial institution.

14 (2) All DOCUMENTS evidencing checking accounts held by YOU at any
15 financial institution.

16 (3) All DOCUMENTS evidencing money market accounts held by YOU.

17 (4) All DOCUMENTS evidencing certificate of deposit accounts or bonds
18 held by YOU at any financial institutions.

19 (5) All DOCUMENTS evidencing shares and/or certificates of stock in
20 corporations held by YOU.

21 (6) All DOCUMENTS evidencing the amount and source of YOUR total
22 gross income, from all sources, during the last five (5) years.

23 (7) All DOCUMENTS evidencing interests in partnerships held by YOU.

24 (8) All DOCUMENTS evidencing interests in corporations held by YOU.

25 (9) All DOCUMENTS evidencing interests in joint ventures held by YOU.

26 (10) All DOCUMENTS evidencing interest in any business held by YOU.

1 (11) All DOCUMENTS evidencing YOUR position as officer of any
2 corporation or business.

3 (12) All DOCUMENTS evidencing YOUR position as partner of any interest
4 of any partnership or business.

5 (13) All DOCUMENTS evidencing membership by YOU in any Limited
6 Liability Company or Limited Liability Partnership.

7 (14) All DOCUMENTS evidencing titles on any motor vehicles (automobiles,
8 motorcycles, trucks) held by YOU.

9 (15) All DOCUMENTS evidencing any liens on any motor vehicles held by
10 YOU.

11 (16) All DOCUMENTS evidencing title held on any boats by YOU.

12 (17) All DOCUMENTS evidencing any liens on any boats held by YOU.

13 (18) All DOCUMENTS evidencing any real property held by YOU.

14 (19) All DOCUMENTS evidencing any liens on any real property held by
15 YOU.

16 (20) All financial statements, including, without limitation, any balance sheets
17 and/or profit and loss statements, of YOU, prepared within the last five (5) years.

18 (21) All DOCUMENTS evidencing YOUR present employer and/or
19 employment.

20 (22) All DOCUMENTS evidencing services rendered by YOU in the last five
21 (5) years.

22 (23) All DOCUMENTS evidencing services that YOU may render in the
23 future.

24 (24) All financial statements, including, without limitation, any balance sheets
25 and/or profit and loss statements, for any and/or all joint ventures, partnerships or corporations in
26 which YOU, hold an interest.

27

28 CASE NO. CV11-01315 JAK (CWx)

NOTICE OF EXAMINATION OF KENNETH EADE
PURSUANT TO MARCH 26, 2012 COURT ORDER

1 (25) All DOCUMENTS evidencing monthly income earned by YOU within
2 the last five (5) years.

3 (26) All DOCUMENTS evidencing YOUR monthly expenses for the last five
4 (5) years.

5 (27) All DOCUMENTS evidencing debts payable to YOU.

6 (28) The Original and a copy of YOUR social security card.

7 (29) The Original and a copy of YOUR State driver's license, for all states in
8 which each is licensed to drive.

9 (30) All DOCUMENTS evidencing insurance policies held by YOU.

10 (31) All DOCUMENTS evidencing safe deposit boxes held by YOU.

11 (32) All DOCUMENTS evidencing Court actions wherein YOU are named as
12 a Plaintiff or Cross-Complainant.

13 (33) All DOCUMENTS evidencing accounts maintained by YOU with credit
14 unions.

15 (34) All DOCUMENTS evidencing money due from any state, city, county or
16 federal government agency or department to YOU.

17 (35) All DOCUMENTS evidencing interest in any Court Judgment held by
18 YOU.

19 (36) All DOCUMENTS evidencing any intangible assets of YOU, including,
20 without limitation, copyrights, trademarks or patents.

21 (37) All DOCUMENTS evidencing every physical asset presently owned by
22 YOU with a value in excess of \$500.00.

23 (38) All DOCUMENTS evidencing every physical asset held by a third party
24 for YOU.

1 (39) All DOCUMENTS evidencing any intangible assets of each of YOU,
2 including, without limitation, copyrights, trademarks or patents, held by a third party for the
3 benefit of YOU.

4 (40) All DOCUMENTS evidencing any interest held by YOU in any
5 promissory notes, drafts, bills of exchange or other commercial paper.

6 (41) All DOCUMENTS evidencing any funds or property YOU are entitled to
7 receive.

8 (42) All DOCUMENTS evidencing any funds or property that are to be paid to
9 any third party or entity on behalf of YOU.

10 (43) All DOCUMENTS evidencing the current residence address and
11 telephone number of YOU.

12 (44) All DOCUMENTS evidencing the current business address and telephone
13 number of YOU.

14 (45) All DOCUMENTS evidencing any transfers of property by or to any
15 EADE ENTITIES, with a value in excess of \$500.00, within the last five (5) years.

16 (46) All DOCUMENTS evidencing any transfers of funds by or to YOU in
17 excess of \$500.00, within the last five (5) years.

18 (47) All DOCUMENTS evidencing any interest of YOU as a beneficiary of a
19 trust.

20 (48) All DOCUMENTS evidencing any interest of any YOU as a trustor of a
21 trust.

22 (49) All financial statements, including, without limitation, any balance sheets
23 and/or profit and loss statements, of any and/or all EADE ENTITIES , prepared from the date of
24 the formation to and including the present.

25 (50) All DOCUMENTS evidencing the amount and source any and all EADE
26 ENTITIES total gross income, from all sources, from inception to and including the present.
27

1 (51) All DOCUMENTS evidencing the formation of any and/or all EADE
2 ENTITIES.

3 (52) All DOCUMENTS evidencing the ownership rights held in any and/or all
4 EADE ENTITIES from the date of formation to the including the present.

5 (53) All DOCUMENTS evidencing the transfer of money to and/or from any
6 and/or all EADE ENTITIES from the date of the formation to and including the present.

7 (54) All DOCUMENTS evidencing the transfer of any asset, other then money,
8 to and/or from any and/or all EADE ENTITIES to YOU, from the date of the formation to and
9 including the present.

10 (55) All financial statements, including, without limitation, any balance sheets
11 and/or profit and loss statements, of any and/or all EADE ENTITIES, prepared from the date of
12 the formation to and including the present.

13 (56) All DOCUMENTS evidencing the amount and source any and/or all EADE
14 ENTITIES total gross income, from all sources, from inception to and including the present.

15 (57) All DOCUMENTS evidencing ownership of property in Beausoliel, France.

16 (58) All DOCUMENTS evidencing ownership of shares in Independent Film
17 Development Corporation.

18 (59) All DOCUMENTS evidencing shares of Independent Film Development
19 Corporation gifted by YOU.

20 (60) All DOCUMENTS evidencing shares of Independent Film Development
21 Corporation gifted by EADE ENTITIES.

22 (61) All DOCUMENTS evidencing YOUR ownership in Kenata Corporation.

23 ///

1 (62) All DOCUMENTS evidencing YOUR ownership in Gold Standard Mining
2 Corporation.

3 Dated: June 1, 2012

BOSTWICK & JASSY LLP

4
5
6 By



7 KEVIN L. VICK
8 Attorneys for Defendants
9 InvestorsHub.com, Inc.
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

**DECLARATION OF KEVIN L. VICK RE REQUEST FOR PRODUCTION OF
DOCUMENTS AND THINGS PURSUANT TO THE MARCH 26, 2012 COURT-
ORDERED EXAMINATION OF KENNETH EADE**

1
2
3
4
5 1. I am an attorney duly licensed to practice law before the United States District
6 Court, Central District of California. I am a member of the law firm of Bostwick & Jassy, LLP,
7 attorneys for Defendant INVESTORSHUB.COM, INC. ("Defendant").

8 2. On September 27, 2011, the Court granted an Order in this case in favor of
9 Defendant and against Plaintiff Kenneth Eade. Pursuant to the Order, Defendant was awarded
10 the total sum of \$49,000.00 with interest at the maximum legal rate accruing from date of entry
11 of the Order to present.

12 3. On March 28, 2012, the Court entered an Order requiring Plaintiff Kenneth Eade
13 to appear for examination at a mutually agreed upon time and place between the dates of June
14 13, 2012 to June 22, 2012.

15 3. Plaintiff has failed and refused, and continues to fail and refuse, to pay the sum
16 due and owing to Defendant.

17 4. Defendant has conducted investigation and discovery as to the assets of the
18 Plaintiff and these efforts have yielded incomplete information concerning Plaintiff's assets.

19 5. As a consequence, Defendant, through an order of the Court, has initiated the
20 within Examination procedure and requests for production, for good cause in order to satisfy the
21 debt owed to it by Plaintiff, that the following categories of documents be produced pursuant to
22 the Court- Ordered Examination.

23 7. I am informed and believe, and therefore allege, that responding party has in his
24 possession, custody or control the documents represented in the categories identified above.

25 ///
26
27

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


KEVIN L. VICK

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles; I am over the age of eighteen years and not a party to the within entitled action; my business address is 15303 Ventura Blvd., 9th Floor, Sherman Oaks, CA 91423.

On June 1, 2012, I served the following document(s) described as

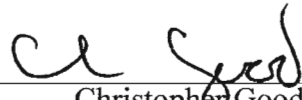
NOTICE OF EXAMINATION OF KENNETH EADE PURSUANT TO MARCH 26, 2012 COURT ORDER; REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS; AND DECLARATION OF KEVIN L. VICK IN SUPPORT THEREOF

on the interested party(ies) in this action by placing true copies thereof enclosed in sealed envelopes and/or packages addressed as follows:

Kenneth G. Eade
6399 Wilshire Blvd, Suite 507
Los Angeles, CA 90048
(323) 782-8802
keneade@gmail.com
keneade93101@yahoo.com

- ☒ **BY HAND DELIVERY:** I caused such envelope(s) to be delivered by hand to the office of the addressee(s) by On Time Messenger Service.
- ☐ **ELECTRONIC MAIL:** I caused said document(s) to be transmitted by email on this date before 5:00 p.m. PST. The name(s) and email address(s) of the person(s) served are set forth in the service list above.
- ☐ **FEDERAL:** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing information in the proof of service is true and correct.

Executed on June 1, 2012.



Christopher Good