

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

FOWLER & GOOD LLP
CHRISTOPHER B. GOOD, Cal. Bar No 232722
cgood@fowlergood.com
15303 Ventura Blvd., 9th Floor
Sherman Oaks, CA 91423
Telephone: 818-302-3480
Facsimile: 818-279-2436

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)

**DEFENDANT INVESTORSHUB.COM,
INC.'S STATUS REPORT**

1 **I. KENNETH EADE IS MISLEADING THE COURT AND DEFENDANTS**
2 **IN THIS MATTER**

3 Kenneth Eade is misleading the Court. It becomes more clear with each
4 declaration and/or assertion by Kenneth Eade that he has been less than forthcoming
5 with his disclosures to the Court and Defendant/Judgment Creditor.

6 There is no reason to believe a single statement offered by Kenneth Eade. In
7 the most recent declaration filed by Kenneth Eade with the Court, he identifies that
8 his “current wife, Valentina Eade, holds 6,486,900 shares of Independent Film
9 Development Corporation.” (Doc. 84, Declaration of Kenneth Eade, pg. 2:23-24).
10 Yet in the SEC filing in which he identifies the transferring of the stock, he indicates
11 that the stock were transferred on June 4, 2012 as part of a separation agreement. (A
12 true and correct copy of the SEC filing is attached hereto as Exhibit 1). In his
13 examination, Kenneth Eade identifies that the transfer was 10,000,000 shares and it
14 was done months before June 21, 2012. (A true and correct copy of excerpts from
15 the Examination are attached hereto as Exhibit 2). There is no way to adequately
16 determine what the truth is as far as Kenneth Eade’s representations. Either way,
17 there are material facts which should have been disclosed by Eade in his declaration
18 to the Court regarding this asset.

19 There are other unresolved issues in this matter in regards to the financial
20 affairs of Kenneth Eade, including, but not limited to, his ability to pay for an
21 extended trip to Mexico while claiming a lack of financial resources, his failure to
22 still adequately explain the continuing possession of the Maserati, discrepancies
23 between the stated timing under oath of the transfer of in excess of 10.5 million
24 shares to his wife and SEC filings which indicate a more recent date for transfer,
25 raising the spector of whether the shares were transferred to avoid paying the
26 judgment in this case. Further, with the most recent SEC litigation being filed against
27 Kenneth Eade, it is difficult to ascertain what businesses he is actively involved with.
28 Also, while Eade discloses the price drop for IFLM, what he does not disclose is the

1 reason for the drop, which is the selling of millions of shares of IFLM in the month of
 2 August. (A true and correct copy of IFLM stock trades for August 2012 is attached
 3 hereto as Exhibit 3.) It is unknown as to whether Eade and/or his wife/ex-wife had
 4 any involvement in the stock sales. Finally, there is no indication in his declaration
 5 as to what is happening with the property in France. This lack of candor is
 6 unacceptable and should not be tolerated by the Court.

7 Kenneth Eade has time and again failed to provide pertinent information
 8 regarding his financial affairs. iHub has committed a lot of time, energy and money
 9 to collecting the monies owed to it by Kenneth Eade, monies which Eade is doing his
 10 best to hide.¹ iHub's legal bills on the collection issue, the extent to which Eade has
 11 contributed greatly through his lack of candor with this Court, approach levels at
 12 which it makes no financial sense to continue to pursue collection of the judgment.
 13 Given that Eade's relentless obstreperousness, this Court should amend its judgment
 14 to include the fees iHub has incurred in attempting to collect Eade's debt. iHub
 15 looks forward to the Court questioning Kenneth Eade on his financial affairs at the
 16 hearing scheduled for this coming Monday, October 1, 2012.

17
 18 Dated: September 27, 2012

BOSTWICK & JASSY LLP

19 By /s/ Kevin L. Vick
 20 KEVIN L. VICK

21 THOMAS & LOCICERO PL

22 By /s/ Deanna Shullman
 23 DEANNA K. SHULLMAN
 24 *Admitted pro hac vice*

25
 26 ¹ iHub sought around \$75,000 in fees (Dkt. 77) and costs and was awarded \$49,000
 27 (Dkt. 59). Accordingly, iHub has spent far more defending this action than it can
 28 ever collect and is now being forced by Eade to spend additional money to collect
 even that to which this Court ordered it entitled.

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FOWLER & GOOD LLP

By /s/ Christopher Good
CHRISTOPHER B. GOOD

Attorneys for Defendant
InvestorsHub.com, Inc.

DECLARATION OF CHRISTOPHER B. GOOD

I, Christopher Good, declare as follows:

1. I am an attorney admitted to practice before all state and the Central District Federal Court in the State of California. I am a partner of Fowler & Good LLP, and I am one of the lawyers responsible for representing Defendant InvestorsHub.com, Inc. ("iHub") in this action. The matters stated herein are true of my own personal knowledge.

2. A true and correct copy of the SEC Form 4 filed by Kenneth Eade on June, 5, 2012 is attached hereto as Exhibit 1 and incorporated herein by this reference.

3. A true and correct copy of excerpts from the June 21, 2012 judgment debtor examination of Kenneth Eade are attached hereto as Exhibit 2 and incorporated herein by this reference.

4. A true and correct copy of the Yahoo Financial Page Historical Prices for Independent Film Development Corporation (IFLM) for the month of August 2012 is attached hereto as Exhibit 3 and incorporated herein by this reference.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 27, 2012 in Los Angeles, California.

/s/ Christopher Good