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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)

**DECLARATION OF CHRISTOPHER
B. GOOD IN SUPPORT OF
DEFENDANT INVESTORSHUB.COM,
INC.'S APPLICATION TO RECOVER
ATTORNEY'S FEES PURSUANT TO
THE COURT'S JULY 11, 2013 ORDER**

CASE NO. CV11-01315 JAK (CWx)

**DECLARATION OF CHRISTOPHER B. GOOD IN
SUPPORT OF DEFENDANT INVESTORSHUB.COM,
INC.'S APPLICATION TO RECOVER ATTORNEY'S
FEES**

DECLARATION OF CHRISTOPHER B. GOOD

I, Christopher Good, declare as follows:

1. I am an attorney admitted to practice before all State Courts 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. in this action. The matters stated herein are true of my own personal knowledge except where stated upon information and belief and if called as a witness herein, I could and would competently testify hereto.

2. This declaration is submitted in support of InvestorsHub.com, Inc.'s Application for Fees and Costs as ordered by the Court pursuant to the July 11, 2013 hearing and order.

3. My hourly rate is generally \$325.00 per hour with my rate on this matter at \$300 per hour. I have been litigating state and federal matters for nearly nine years with seven of those years handling collections related litigation in both state and federal court. This past year I was selected as a "Rising Star" by the publishers of Los Angeles Magazine in the field of business litigation. I am informed and believe that selection as a "Rising Star" is a peer-reviewed honor given to only 2.5% of attorneys in the Southern California area.

4. I am familiar with the billing rates for attorneys in the Los Angeles area. Before founding Fowler & Good LLP, my practice focused on civil litigation matters for two boutique business litigation firms. Prior to those firms, I worked for Girardi & Keese, one the preeminent plaintiff's firms in the Country. Based on my experience, I believe that my billing rates are below or equal to the average billing rate for equally experienced attorneys.

5. Attached hereto as Exhibit A and incorporated herein by this reference are true and correct copies of time records for legal services and costs reports reflecting attorneys' fees and costs incurred by iHub pertaining to the contempt proceedings. The entries have been redacted to exclude fees not sought by iHub by

1 way of this application. The entries have also been redacted to protect attorney-client
2 and/or attorney work product material. Such redactions were made in the interest of
3 judicial efficiency and to avoid the waiver of any privileges or doctrines, all of which
4 are expressly reserved.

5 6. The fees and costs reflected in Exhibit A were actually incurred by iHub,
6 and iHub has been or will be billed for those fees and costs. (The July bill is a draft
7 bill only and will not be finalized until the end of the month; the time charges and
8 costs identified on that billing statement have been incurred by iHub and are accurate
9 to this date.)

10 7. In addition to the fees identified, I am aware of \$2,935.60 that has been
11 incurred by co-counsel, Thomas & LoCicero PL in regards to the contempt
12 proceedings. These fees are not being sought nor have they been identified as part of
13 the basis for recovery of fees or costs in the application.

14
15 I declare under penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct. Executed on July 22, 2013 in Los
17 Angeles, California.

18
19 /s/ Christopher Good

20 Christopher B. Good
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28

EXHIBIT A

FOWLER & GOOD

A LIMITED LIABILITY PARTNERSHIP

15303 VENTURA BOULEVARD, 9th FLOOR
SHERMAN OAKS, CALIFORNIA 91403

TELEPHONE (818) 302-3480

FACSIMILE (818) 279-2436

Investorshub.com
c/o Deanna Shullman
dshullman@tlolawfirm.com

INVOICE

Invoice Period February 2013 to March 4, 2013 for the Eade Matter, Case No CV11-01315

<u>Fees</u>			
<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
2/5/13	Go to Santa Monica Courthouse and review Eade divorce file	CBG	\$450.00 (1.5 hour)
2/19/13			
2/21/13	T/C with DS re OSC Filing	CBG	\$75.00 (.25 hour)
2/25/13			
2/26/13			
2/27/13	T/C with DS re OSC Filing	CBG	\$30.00 (.10 hour)
2/28/13	Review Santa Monica Court Records, Previous OSC and Other Orders from the Federal Action, begin draft of OSC Re Contempt,	CBG	\$900.00 (3 hours)
3/4/13	Finalize and file OSC along with Declaration and Proposed Order, Prepare service copy for Court Delivery, E-mails to DS re filing	CBG	\$825.00 (2.75 hours)
<u>Costs</u>			
<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
1/31/13	Janney Courtesy Copy Filing Charges	CBG	\$30.00

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Invoice --February 2013

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2/5/13	Court Printing Costs	CBG	\$63.00
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Rates

Ryan H. Fowler (\$300/hour)

Christopher B. Good (\$300/hour)

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INVOICE

Invoice Period March 5, 2013 to March 31, 2013 for the Eade Matter, Case No CV11-01315

<u>Fees</u>			
<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
3/14/13	Draft notice of Non-Opposition/Reply; Send to Client	CBG	\$75.00 (.25 hour)
3/15/13	Finalize and File Non-Opposition/Reply, File with Court and Send Courtesy Chambers Copy, Review Eade Untimely Opposition Brief	CBG	\$450.00 (1.5 hour)
3/16/13			
3/18/13	Review Eade Opposition	CBG	\$75.00 (.25 hour)
3/19/13			
3/20/13			
3/21/13	Draft Reply Brief and Objection to Eade Objection	CBG	\$975.00 (3.25 hours)
3/22/13	E-mails to client re Reply Brief and Objection; Finalize, File and Courtesy File the Briefs	CBG	\$150.00 (.5 hour)
3/27/13			
<u>Costs</u>			
<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
3/4/13	Janney Courtesy Copy Filing Charges	CBG	\$30.00

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Invoice –February 2013
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3/15/13	Janney Courtesy Copy Filing Charges	CBG	\$30.00
3/25/13	Janney Courtesy Copy Filing Charges	CBG	\$30.00

Rates

Ryan H. Fowler (\$300/hour)
Christopher B. Good (\$300/hour)

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INVOICE

Invoice Period April 2013 for the Eade Matter, Case No CV11-01315

Fees

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
4/4/13	T/C with Deanna Shullman re 4/18 Hearing	CBG	\$75.00 (.25 hour)
4/10/13	Review declarations in Santa Monica divorce Proceedings and compare to declarations filed In Present Matter for further inconsistencies and Misrepresentations to the Court, Review of Other Relevant Documents from Santa Monica Court File	CBG	\$375.00 (1.25 hours)
4/16/13	Review complete file in Federal Matter, including Relevant Orders and Declarations, Review Prior OSC Re Contempt Motion	CBG	\$675.00 (2.25 hours)
4/17/13	Final Preparations for Hearing, e-mails to Deanna Shullman re pre-appearance call	CBG	\$900.00 (3.0 hours)
4/18/13	Hearing and T/C to Deanna Shullman	CBG	\$1,275.00 (4.25 hours)
4/22/13			
4/23/13	Review Court Order – Docket 106	CBG	\$30.00 (.10 hour)
4/24/13			
4/26/13	Begin Researching and Drafting Offers of Proof	CB G	\$300.00 (1 hour)

Costs

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
4/18/13	Parking Costs	CBG	\$8.00

Rates

Ryan H. Fowler (\$300/hour)
Christopher B. Good (\$300/hour)

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Invoice Period May 2013 for the Eade Matter, Case No CV11-01315

<u>Fees</u>			
<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
5/10/13	Further Researching and Drafting of Offers of Proof	CB G	\$600.00 (2 hour)
5/10/13			
5/10/13			
5/12/13	Further Researching and Drafting of Offers of Proof	CB G	\$300.00 (1 hour)
5/13/13	Finalize and file Offers of Proof	CBG	\$450.00 (1.5 hours)
5/22/13	Review Opposition Brief and Reply to Client	CB G	\$150.00 (.5 hour)
5/23/13			
5/28/13			
5/29/13			
5/30/13			
5/31/13	Draft and File Objection	CBG	\$225.00 (.75 hour)

<u>Costs</u>			
<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>

Rates

Ryan H. Fowler (\$300/hour)
Christopher B. Good (\$300/hour)

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Invoice Period June 2013 for the Eade Matter, Case No CV11-01315

Fees

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
6/10/13			
6/11/13			
6/13/13			
6/14/13			
6/17/13	Review Contempt Hearing documents and Procedure for meeting	CBG	\$300.00 (1 hour)
6/19/13			
6/25/13			
6/27/13			

Costs

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
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Rates

Ryan H. Fowler (\$300/hour)
Christopher B. Good (\$300/hour)

FOWLER & GOOD

A Limited Liability Partnership

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INVOICE

Invoice Period July 2013 for the Eade Matter, Case No CV11-01315

Fees

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
7/1/13			
7/8/13	Pull together evidentiary documentation and procedure for hearing	CBG	\$900.00 (3 hours)
7/10/13	Finalize all documents for hearing, further preparation Including preparation of examination of Kenneth Eade, t/c with Court re Eade	CBG	\$1,200.00 (4 hours)
7/11/13	Pre-Hearing preparation and hearing	CBG	\$1,800.00 (6 hour)
7/12/13			
7/17/13			
7/17/13			
7/22/13			

Costs

<u>Date</u>	<u>Description</u>	<u>Attorney</u>	<u>Amount</u>
7/11/2013	FedEx Copies	CBG	\$89.27
7/11/2013	Parking for Hearing	CBG	\$8.00

Rates

Ryan H. Fowler (\$300/hour)
Christopher B. Good (\$300/hour)