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Attorney for Plaintiff

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 DOES 10
through 100,

Defendants.

Case No. CV11-01315 JAK (CWx)

**PLAINTIFF KENNETH EADE'S
OPPOSITION TO DEFENDANT'S
ATTORNEY FEE REQUEST**

Date: August 1, 2013
Time: None
Courtroom: None
Judge: Hon. John A. Kronstadt

Plaintiff KENNETH EADE herewith opposes the \$13,848.27 attorney's fees request and sanctions on the following grounds:

1. The request is predicated on "multiple misrepresentations" and "violations of court orders" that simply did not occur. This Court declined holding Plaintiff in contempt because it found that Plaintiff had substantially complied with the Court's Orders.

1 2. The fees are excessive. The Defendant has directed all its attorney's fees at
2 contempt proceedings when, after receiving information from Plaintiff in his debtor's
3 examination, it could have levied the Plaintiff's bank account or taken other actions more
4 likely to end with Plaintiff's compliance with the judgment rather than contempt
5 proceedings.

6 3. The request for unspecified sanctions is vague and ambiguous, and Plaintiff
7 has no notice of what sanctions are being requested, on what grounds, or how to oppose
8 such a request.

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10 Dated: July 31, 2013

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12 /s/ Kenneth Eade
13 KENNETH EADE
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action, my business address is 6399 Wilshire Blvd., Suite 507, Los Angeles, California 90048.

On August 1, 2013, I served the foregoing documents described as:

PLAINTIFF KENNETH EADE'S OPPOSITION TO DEFENDANT'S ATTORNEY FEE REQUEST

on the parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

☐ BY U.S. MAIL: I enclosed the documents in a sealed envelope or package address to the above-named persons at the addresses exhibited therein and (specify one):

☐ I placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this firms practice for collecting and processing correspondence for mailing. On the same day that correspondence or other service document is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage thereon fully prepaid.

I am employed in the county where the mailing occurred. The envelope or package was placed in the mail at Los Angeles, California.

☒ BY CM/ECF: The document was electronically served on the parties to this action via the mandatory United States District Court of California CM/ECF system upon electronic filing of the above-described document.

Executed this 1st day of August, 2013, at Los Angeles 90048.

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.

/s/ Nichelle Guzmán
NICHELLE GUZMAN