

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)

**DECLARATION OF CHRISTOPHER
B. GOOD IN SUPPORT OF
DEFENDANT INVESTORSHUB.COM,
INC.'S OPPOSITION TO THE EX
PARTE MOTION TO APPEAR BY
TELEPHONE OF KENNETH EADE**

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 Opposition to the Ex Parte Motion to Appear by Telephone being brought by Kenneth Eade.

3. Attached hereto as Exhibit 1 is a true and correct copy of the April 26, 2016 e-mail from Kenneth Eade.

4. On June 15, 2016 at approximately 3:06 p.m., I was contacted by an individual claiming to be Kenneth Eade's legal assistant. At that time she provided me notice of the Ex Parte and I indicated to her that Investorshub.com opposes the motion.

5. On June 16, 2016 at approximately 11:07 am, prior to Eade filing his Ex Parte Motion, I sent an e-mail to Kenneth Eade and his assistant indicating that Investorshub.com opposes the motion. Attached hereto as Exhibit 2 is a true and correct copy of the June 16, 2016 e-mail.

///

Exhibit 1



Chris Good <cgood@fowlergood.com>

OSC re contempt

Eade Kenneth <info@kennetheade.com>
Reply-To: Eade Kenneth <info@kennetheade.com>
To: cgood@fowlergood.com

Tue, Apr 26, 2016 at 1:53 PM

Dear Chris,

We got the judge's order today for a personal appearance in June. As I told you outside the courtroom last time, I cannot appear in the States. I was there last time with the agreement of the DOJ. Therefore, your client has two choices: You can either agree to take the OSC off calendar, in which case I will keep you informed of the sale of the house in France and will pay your client when it is sold, or I will file a chapter 7 bankruptcy petition before the June hearing date and let the trustee in bankruptcy take care of all these financial matters. Please let me know what option you select.

Ken

Kenneth G. Eade

Author/Attorney/Consultant

<http://kennethgeade.com>

http://www.amazon.com/Kenneth-Eade/e/B00EWT89RG/ref=ntt_athr_dp_pel_pop_1

This communication is for its intended recipient only, and may contain information that is privileged, confidential and exempt from disclosure under applicable law. This communication constitutes an electronic communication within the meaning of the Electronic Communications Privacy Act, 18 U.S.C. 2510, and its disclosure is strictly limited to the recipient intended by the sender of the message. This communication may contain confidential information and privileged material that is for the sole use of the intended recipient and receipt by anyone other than the intended recipient does not constitute a loss of the confidential or privileged nature of the communication. If you are not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any unauthorized use, dissemination, distribution or copying of this communication is strictly prohibited and may subject you to criminal or civil penalty. If you have received this communication in error, please notify us immediately by telephone (323-782-8802) or e-mail reply, and delete the message from your system, and destroy any hard copy you may have printed. Thank you.

Exhibit 2



Chris Good <cgood@fowlergood.com>

Notice of Ex Parte to Appear by Telephone; Eade v. IHUB, Case No. 11-cv-01315 JAK (CWx)

Chris Good <cgood@fowlergood.com>

Thu, Jun 16, 2016 at 11:07 AM

To: "Eade Law (NGuzman)" <nichelle.guzman@onebox.com>

Cc: jmcguire@tlolawfirm.com, Deanna Shullman <dshullman@tlolawfirm.com>, Eade Kenneth <info@kennetheade.com>

Ms. Guzman,

Please advise as to whether Mr. Eade is actually going to file his ex parte Application. I have not seen anything filed on the docket. Again, we will be opposing the filing of the ex parte application.

With Kind Regards,

Chris Good

[Quoted text hidden]

--

Christopher B. Good
Fowler & Good LLP
15303 Ventura Blvd., 9th Floor
Sherman Oaks, CA 91403
Tel. 818.302.3480
Fax. 818.279.2436

We do not accept any ex parte or other notice or official correspondence by email. This e-mail communication (including any attachment) is covered by the Electronic Communications Privacy Act, 18 U.S.C. 2510 et seq. This communication is CONFIDENTIAL. Any legal advice contained herein is PRIVILEGED and intended only for disclosure to or use by the person(s) listed above. If you are neither the intended recipient(s), nor a person responsible for the delivery of this communication to the intended recipient(s), you are hereby notified that any retention, dissemination, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify Fowler & Good LLP immediately by using the "reply" feature and then immediately delete this message and all attachments from your computer.

In compliance with Internal Revenue Service circular 230, we inform you that any U.S. federal tax advice contained in this communication is not intended or written to be used, and cannot be used, for the purpose of (1) avoiding penalties under the internal revenue code or (2) promoting, marketing or recommending to another party any tax-related matter[s] addressed herein.

Exhibit 3



Thursday, June 16, 2016

ATTORNEY SEARCH

Kenneth G. Eade - #93774

Current Status: Active

This member is active and may practice law in California.

See below for more details.

Profile Information

The following information is from the official records of The State Bar of California.

Bar Number: 93774

Address:

Law Office of Kenneth Eade
261 Meadow Mist Ct
Simi Valley, CA 93065

Phone Number: (323) 782-8802

Fax Number: (323) 704-3539

e-mail: keneade93101@yahoo.com

Undergraduate School:

California St Univ Northridge; CA

Law School:

Southwestern Univ SOL; Los Angeles CA

County: Ventura

District: District 2

Sections:

None

ATTORNEY PROVIDED INFORMATION

The information below was provided by the attorney and has not been verified or monitored. The State Bar does not recommend or endorse any attorney.

Practice Area(s):

Business Law

Other Language(s) Spoken by this Attorney:

Russian

Status History

Effective Date	Status Change
Present	Active
9/17/2003	Active
9/16/2003	Not Eligible To Practice Law
4/17/1998	Active
4/12/1998	Not Eligible To Practice Law
7/22/1997	Active
7/21/1997	Not Eligible To Practice Law
5/21/1997	Active
5/7/1997	Not Eligible To Practice Law
8/15/1996	Active
8/12/1996	Not Eligible To Practice Law
8/26/1994	Active
8/22/1994	Not Eligible To Practice Law

9/28/1992	Active
7/31/1992	Not Eligible To Practice Law
9/3/1991	Active
8/12/1991	Not Eligible To Practice Law
7/30/1990	Active
7/30/1990	Not Eligible To Practice Law
8/18/1988	Active
7/25/1988	Not Eligible To Practice Law
11/8/1985	Active
8/5/1985	Not Eligible To Practice Law
10/15/1984	Active
7/9/1984	Not Eligible To Practice Law
12/16/1980	Admitted to The State Bar of California

Explanation of member status

Actions Affecting Eligibility to Practice Law

Effective Date	Description	Case Number	Resulting Status
Disciplinary and Related Actions			

Overview of the attorney discipline system.

1/11/2001	Discipline, probation; no actual susp.	99-O-10855	
12/1/1995	Discipline, probation; no actual susp.	92-O-18001	
7/31/1992	Discipline w/actual suspension	90-O-11712	Not Eligible To Practice Law

Administrative Actions

9/16/2003	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law
4/12/1998	Suspended/Child & Fam Supp noncompliance		Not Eligible To Practice Law
7/21/1997	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law
5/7/1997	Suspended/Child & Fam Supp noncompliance		Not Eligible To Practice Law
8/12/1996	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law
8/22/1994	Suspended/Child & Fam Supp noncompliance		Not Eligible To Practice Law
8/10/1992	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law
8/12/1991	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law
7/25/1988	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law
8/5/1985	Suspended, failed to pay Bar membr. fees		Not Eligible To Practice Law

7/9/1984

Suspended, failed to pay Bar membr. fees

Not Eligible To Practice
Law

Copies of official attorney discipline records are available upon request.

Explanation of common actions

California Bar Journal Discipline Summaries

Summaries from the California Bar Journal are based on discipline orders but are not the official records. Not all discipline actions have associated CBJ summaries. Copies of official attorney discipline records are available upon request.

January 11, 2001

KENNETH G. EADE [#93774], 43, of Santa Barbara was suspended for one year, stayed, placed on two years of probation and was ordered to take the MPRE within one year. The order took effect Jan. 11, 2001.

In a bankruptcy matter, Eade deposited \$4,300 in fees into his personal account rather than his client trust account. When his client said he no longer needed to file for bankruptcy, Eade agreed to refund \$3,425 but did not do so. The client won a small claims judgment of \$4,418, which Eade paid a year later.

In mitigation, Eade had serious financial problems at the time of the misconduct, he has done extensive pro bono work for almost 20 years and he presented evidence of his good character.

December 1, 1995

KENNETH G. EADE [#93774], 38, of Oxnard was suspended for nine months, stayed, and placed on two years of probation. The order took effect Dec. 1, 1995.

In two cases, Eade practiced law while suspended. In one of the cases, his client filed three pleadings with the court, purportedly on his own. However, Eade's address and telephone number appeared on the front of the pleadings and the envelopes in which they were sent, and someone from his office signed the proof of service.

Although Eade claimed he dictated and prepared the pleadings prior to his suspension, he remained attorney of record at the time.

In another matter, he improperly acquired an interest adverse to his clients in a bankruptcy case when he agreed to pay them \$3,500 for the title to their home. He gave the clients \$500 in cash but did not pay the remaining money for nine years.

At the time, the clients had no equity in the property and were more than \$24,000 in arrears on their mortgage.

Eade also was disciplined in 1992 for negligent handling of trust funds for one client.

In mitigation, Eade arranged for an attorney to substitute in for him during his suspension in all cases but the two in question. The substitutions in those cases were made late. No parties were harmed by Eade's actions.

[Start New Search »](#)