

CANADA

SUPERIOR COURT  
(Commercial Division)

PROVINCE OF QUEBEC  
DISTRICT OF MONTREAL

IN THE MATTER OF THE  
BANKRUPTCIES OF:

EARL JONES  
COURT NO. 500-11-037071-095  
ESTATE NO. 41-342155

EARL JONES

-and-

EARL JONES CONSULTANT &  
ADMINISTRATION CORP.  
COURT NO. 500-11-036947-097  
ESTATE NO. 41-341929

EARL JONES CONSULTANT &  
ADMINISTRATION CORPORATION

*18 octobre 2011  
Vie de regente  
Et attendu que les collegues  
respectifs des 2 parties  
les reclamations  
il apparait  
donnae pour*

ESTATE NO. 41-341929

[collectively the "Debtors/Bankrupts"]

*les actifs composent les patrimonies  
des 2 parties delitiques ainsi que  
ont intimement lies et a tout fin confondues,  
RSM LICHTER INC. comme un seul  
le syndic a les  
leur administration; Trustee  
sur ces  
parties*

MOTION FOR THE CONSOLIDATION OF THE  
ADMINISTRATION OF THE ESTATE'S OF EARL JONES AND  
EARL JONES CONSULTANT AND ADMINISTRATION  
CORPORATION  
187, 192 Bankruptcy & Insolvency Act

*AUTORISE le syndic a traiter  
les fins de leur administration  
des dossiers respectifs  
des administrations  
exigibles dans le cas de 2  
distincts*

TO ONE OF THE HONOURABLE JUDGES OF THE SUPERIOR COURT  
(BANKRUPTCY DIVISION), OR TO THE REGISTRAR THEREOF, THE  
MOTION OF YOUR TRUSTEE RESPECTFULLY REPRESENTS:

1. As appears from Court record number 500-11-037071-095, Earl Jones ("EJ") was declared bankrupt on August 10, 2009;
2. As appears from Court record number 500-11-036947-097, Earl Jones Consulting and Administration Corp. ("EJC") was declared bankrupt on July 29, 2009;

*Jean Comte  
Trustee*

3. EJ and EJC perpetrated a ponzi scheme and fraud in the administration of various deceased estates and trusts and for persons whom they were administering funds, and EJ was convicted of criminal fraud in respect thereof and is presently in jail;
4. All Meetings of Creditors in the bankruptcy of EJ and EJC have been held one right after the other, and information delivered in each bankruptcy has been used in the other;
5. The Creditors of the bankruptcies of EJ and EJC are, for all intents and purposes, the same;
6. The Inspectors in each of the EJ and EJC bankruptcies are the same;
7. The Meetings of Inspectors of EJ and EJC bankruptcies have been held on a consolidated basis;
8. The accounting and books and records of EJ and EJC were intertwined and EJ and EJC operated for all intents and purposes as one entity with a total disregard for distinct identities, and accordingly all reports prepared by the Trustee to Inspectors and Creditors have and could only be prepared on a consolidated basis;
9. All notices sent by the Trustee to EJ and EJC Creditors are essentially the same;
10. The Trustee to the bankruptcies of EJ and EJC is the same and the administration of both bankruptcies has to date been performed on a consolidated basis without distinction in order to reduce costs;
11. There is no expected dividend to any of the creditors in the respective bankruptcies ;
11. It is in the interest of all Creditors that this Court grant a formal Order providing for the administrative consolidation of both bankruptcies of EJ and EJC, the whole for expediency and to save ongoing costs.

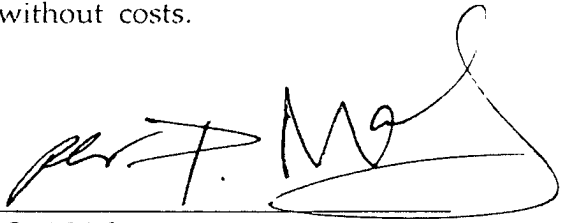
**WHEREFORE YOUR TRUSTEE PRAYS THAT BY JUDGMENT TO INTERVENE:**

1. All matters of administration of the bankruptcies of EJ and EJC by the Trustee thereto be consolidated into one, such that:

- a. All future Meetings of Creditors and Inspectors of EJ and EJC be held together;
- b. All notices, letters and communications and reports of the Trustee of the EJ and EJC bankruptcies be consolidated into one notice, as opposed to two;
- c. The Trustee and its counsel's billing and taxation of all accounts in the bankruptcies of EJ and EJC be consolidated into one bill to both bankruptcies jointly and severally;
- d. All reports and notices for the EJ and EJC bankruptcies be sent on one report or notice bearing the names and numbers of both bankruptcies.

THE WHOLE without costs.

Montreal, October 17, 2011



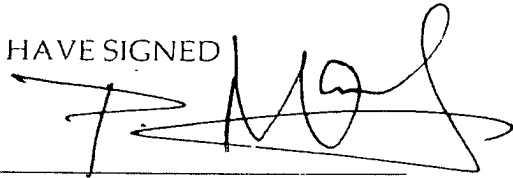
RSM Richter Inc., Trustee

AFFIDAVIT

I, the undersigned, **PHIL MANEL**, Chartered Accountant, practicing my profession at RSM Richter Inc., 2 Place Alexis Nihon, in the City and District of Montreal, Province of Quebec, H3Z 3C2, solemnly declare:

1. **THAT** I am one of the representatives of the Trustee herein;
2. **THAT** the facts alleged in the foregoing *Motion for the Consolidation of the Administration of the Estates* are true and correct.

AND I HAVE SIGNED



PHIL MANEL, C.A.

Solemnly declared before me at Montreal,  
this 17th day of October, 2011.

Karyn Torrie  
Commissioner for Oaths

