

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

LARA LAVI, individually and as Primary Shareholder, Sole
Managing Member, and Chief Executive Officer of
WIDEAWAKE – DEATHROW ENTERTAINMENT LLC
142 E 16th Street, Suite 22C
New York, New York 10003

Plaintiffs,

-against-

NEW SOLUTIONS FINANCIAL CORPORATION
4255 Sherwoodtowne Blvd.
Mississauga, ON Canada, L4Z1Y5

NEW SOLUTIONS FINANCIAL CORPORATION d/b/a NEW
SOLUTIONS CAPITAL GROUP INC.
4255 Sherwoodtowne Blvd.
Mississauga, ON Canada, L4Z1Y5

WIDEAWAKE ENTERTAINMENT GROUP INC.
171 E Liberty Street, Suite 310
Toronto, ON Canada, M6K3P6

RONALD OVENDEN, individually and as CEO and Chairman of
the Board of New Solutions Financial Corporation/New Solutions
Capital Group, and as Chairman of Wideawake Entertainment
Group, Inc.
4255 Sherwoodtowne Blvd.
Mississauga, ON Canada, L4Z1Y5

ROBERT THOMPSON-SO, individually and as CIM, FCSI,
CHFS and Managing Director of New Solutions Financial
Corporation/New Solutions Capital Group
4255 Sherwoodtowne Blvd.
Mississauga, ON Canada, L4Z1Y5

Defendants.

SUMMONS WITH NOTICE

Index No.: _____ 09603480

Plaintiff designates New York County
as the place of trial

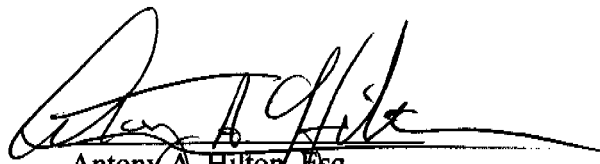
The basis of venue is:
The County of New York is a where the
plaintiff transacts business (NYLLCL §
1301; CPLR § 302) and the County of
New York is where the acts complained
of is occurring (CPLR § 302(a)(1))

FILED
NOV 13 2009
COUNTY CLERK'S OFFICE
NEW YORK

To the above named Defendants:

YOU ARE HEREBY SUMMONED to serve a notice of appearance on the *Plaintiff's Attorney(s)* within twenty (20) days after the service of this summons, exclusive of the day of service (or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear, judgment will be taken against you by default for the relief demanded in the notice set forth below.

DATED: November 12, 2009
New York, New York


Antony A. Hilton, Esq.
Joseph J. Mainiero, Esq.
Attorneys for Plaintiffs
305 Broadway, Ste 402
New York, New York 10007

NOTICE: The nature of this action is for declaratory and injunctive relief pursuant to BCL §§ 307, 626 and 1319, LLCL § 401, and CPLR § 3001.

The relief sought is a judgment of this court:

A. Stay the defendants named above from taking actions, entering into agreements or otherwise binding obligations, exercising any type of shareholder or corporate power, and/or transacting business on behalf of Deathrow for the purpose of preventing any further damage to plaintiffs;

B. Stay actions taken by co-defendant Ronald Ovenden which has caused Deathrow to allegedly adopt unauthorized liabilities implement fraudulent, self-dealing actions to the detriment and damage of the plaintiffs;

C. Order a replevin of all assets fraudulently diverted from Deathrow and misappropriated by defendants;

D. Award reasonable costs and disbursements, as the Court deems just and equitable;

E. Award any and all other relief which this court deems just and proper.

INDEX #:

YEAR: 2009

09603480

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Managing Member, and Chief Executive Officer of
WIDEAWAKE – DEATHROW ENTERTAINMENT LLC,**

Plaintiffs,

-against-

**NEW SOLUTIONS FINANCIAL CORPORATION;
NEW SOLUTIONS FINANCIAL CORPORATION d/b/a
NEW SOLUTIONS CAPITAL GROUP INC.;;
WIDEAWAKE ENTERTAINMENT GROUP INC.;;
RONALD OVENDEN, individually and as CEO and
Chairman of the Board;
ROBERT THOMPSON-SO, individually and as CIM, FCSI,
CHFS, Managing Director and “Delegate”,**

Defendants.

SUMMONS WITH NOTICE


ANTHONY A. HILTON, ESQ

JOSEPH J. MAINIERO, ESQ.
305 Broadway, Ste. 402
New York, NY 10007
T: (212) 267-6611
F: (212) 732-0888