

**IN THE MATTER OF THE *SECURITIES ACT*  
R.S.N.S. 1989, CHAPTER 418, as amended**

- and -

**IN THE MATTER OF AN INVESTIGATION IN RESPECT OF  
KNOWLEDGE HOUSE INC.**

- and -

**IN THE MATTER OF THE MOTION OF DAN POTTER**  
for an order that the panel, R. Daren Baxter recuse himself from any  
further hearing of Knowledge House Inc. matters before the Commission

**NOTICE OF MOTION**

**TAKE NOTICE** that a motion will be made by Dan Potter ("Potter") before R.  
Daren Baxter, Vice Chair of the Commission at 10:00 a.m. on Thursday,  
December 13, 2007 for:

1. An ORDER that R. Daren Baxter recuse himself from any further involvement  
in the hearing of Knowledge House Inc. matters before the Commission on  
the grounds that:
  - (a) he has personal interest in the subject matter and outcome of the  
Knowledge House Inc. civil litigation that conflicts with his duty to act as  
an impartial, disinterested adjudicative decision maker in the Knowledge  
House Inc. matters before the Commission;
  - (b) a reasonable apprehension of bias has arisen from his conflicting  
interests;
  - (c) he has not made sufficient or any disclosure of his interest and has not  
sought and received waiver and/or consent of the parties involved in the  
Knowledge House Inc. matters before the Commission to continue  
hearing such matters; and
  - (d) he has not yet recused himself voluntarily although he has been  
repeatedly requested to do so.
2. Such other ORDERS as may be considered just and necessary.

**AND TAKE NOTICE** that the Applicant will serve on the other Parties and the Commission, at least five (5) days before the day on which the motion is to be heard, further documentation setting out the details of the relief sought, the grounds of the motion, a summary of the evidence and authorities relied upon and such other material as may be advisable.

**DATED** at Halifax, Nova Scotia, this 7<sup>th</sup> day of December, 2007.

Digitally signed by Dan Potter  
Date: 2007.12.07 15:32:43 -04'00'

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On behalf of Knowledge House Inc.  
and himself

**TO:**

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