



IN THE COURT OF CHANCERY OF THE STATE OF DELAWARE

IN RE JOHN Q. HAMMONS HOTELS ) CONSOLIDATED  
INC. SHAREHOLDER LITIGATION ) C.A. No. 758-CC  
)

**CERTAIN DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Defendants John Q. Hammons Hotels, Inc., JQH Acquisition LLC, JQH Merger Corporation, John E. Lopez-Ona, Jacqueline Anne Dowdy, Daniel L. Earley, William J. Hart, Donald H. Dempsey, David C. Sullivan and James F. Moore, by and through their undersigned counsel, hereby move the Court pursuant to Court of Chancery Rule 56 for an order, substantially in the form attached hereto, entering summary judgment in their favor. The grounds for this motion are set forth in their opening brief, which is filed contemporaneously herewith.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

A handwritten signature in black ink that reads "Kevin M. Coen". The signature is written in a cursive style and is positioned above a horizontal line.

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October 24, 2008  
2561983.1

CERTIFICATE OF SERVICE

I hereby certify that on October 24, 2008, CERTAIN DEFENDANTS' MOTION FOR SUMMARY JUDGMENT was caused to be electronically served upon the following counsel of record:

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*/s/ Kevin M. Coen*

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