

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF)
SECURITIES ex. rel. IRVING L.)
FAUGHT, ADMINISTRATOR;)
)
Plaintiffs,)
)
vs.)
)
BARRY POLLARD AND)
ROXANNE POLLARD,)
)
Defendants.)

Case No.: CJ-2005-3799
Judge Vicki Robertson

MOTION FOR PROTECTIVE ORDER

Defendants, Barry and Roxanne Pollard, move the Court to enter a protective order pursuant to 12 O.S. § 3226(C)(1)(b) and (g). The Oklahoma Department of Securities has requested that the Pollards make documents available for review and inspection. The Pollards have agreed based on the following terms:

1. Documents will be available for review at the law office of Field, Trojan, Long & Sedbrook on October 16, 2006 at 8:30 am.
2. The Oklahoma Department of Securities will be allowed to review and inspect the documents produced on October 16, 2006, in an unredacted form.
3. The Oklahoma Department of Securities will not make copies of documents at the time of their initial review. Defendants shall make copies of any documents requested by Plaintiff with the following information redacted: (Confidential Information).
4. All of the information reviewed will be subject to this Protective Order.
5. The information reviewed will be treated as confidential and the Oklahoma

Department of Securities will not use the information obtained during its review for any purposes. However, should the Department believe it is necessary to use an unredacted document in the course of this litigation but cannot reach an agreement with Defendants, the Department may petition the Court regarding the production and subsequent use of the document for purposes of litigation.

6. The Oklahoma Department of Securities will not communicate, reveal or disclose the Confidential Information obtained during their review of these documents to any third party, except by order of this Court.
7. The Plaintiffs' agents, employees, representatives, other counsel or any other person are subject to the Protective Order.
8. The Plaintiffs have agreed to the proposed Protective Order.

Accordingly, Defendants respectfully request that the Court enter an order requiring the Plaintiffs to follow the above guidelines for inspection of the documents.

Respectfully submitted,



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ATTORNEYS FOR DEFENDANTS
Barry and Roxanne Pollard

CERTIFICATE OF MAILING

I hereby certify that on this 16th day of October, 2006, a true and correct copy of the above and foregoing Pleading was placed in the U. S. Mail, postage prepaid, and addressed to the following:

Amanda Cornmesser
Gerri Stuckey
Melanie Hall
First National Center, Suite 860
120 N. Robinson
Oklahoma City, OK 73102
Tele.: 405-280-7700


CAROLIE E. ROZELL