

hearing - 9/20/07 @ 1:30
Ricks

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.
AUG 17 2007
PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

Oklahoma Department of Securities)
ex rel. Irving L. Faught, Administrator,)
)
Plaintiff,)

vs.)

Case No. CJ-2006-10111

Raglin Industries, LLC, an Oklahoma)
limited liability company; Phillip Levaughn)
Raglin, an individual; and Joseph Daniel)
Layne, an individual,)
)
Defendants.)

**MOTION OF TOYOTA MOTOR CREDIT CORPORATION
FOR RELIEF FROM INJUNCTION**

COME NOW Toyota Motor Credit Corporation,(TMCC), by and through its attorney of record, Michael Loyd, and moves the court to modify the temporary injunction entered on January 3, 2007 and any other orders insofar as it relates to the following described vehicles:

- 2006 Lexus LS 430 VIN # JTHBN36F065050916
- 2000 Lexus LX470 VIN# JT6HT00W4Y0076984

1. In support thereof, TMCC alleges and states that it is a secured creditor in and to the above described vehicles, that there is a balance owed on the 2006 Lexus 430 of \$52,916.94, and that the account is in default and past due for five (5) months payments. That the balance owed to TMCC exceeds the value of this vehicle.

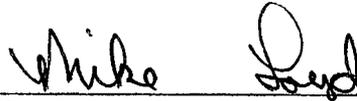
2. TMCC further alleges that there is a balance owed on the 2000 Lexus LX470 in the sum of \$13,111.29, and that the account is in default and past due for over 2 months. TMCC

believes the value of this vehicle is approximately equal to the balance owed to TMCC.

3. TMCC is desirous of filing a replevin action to recover its collateral from its customer, Phillip L. Raglin and Melinda L. Raglin. A copy of TMCC's contracts and lien entry perfections are attached hereto as exhibit "A" pages 1 through 7.

Wherefore, TMCC moves the Court to modify or rescind its prior orders entered in this action preventing TMCC from taking any action to recover on its note and security agreement insofar as it pertains to the above described vehicles, and for such other and further relief which the court may deem just and proper.

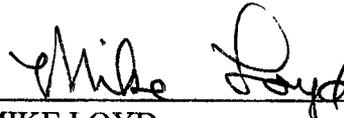
Respectfully Submitted,



Mike Loyd, OBA #5553
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Bethany, OK 73008
Phone (405) 787-9950
Attorney for Toyota Motor Credit Corp.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing instrument was faxed, to Patricia Lebarthe, Oklahoma Department of Securities, at (405) 280-7742, this the 16th day of August, 2007.



MIKE LOYD