

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF SECURITIES
EX REL. IRVING L. FAUGHT,
ADMINISTRATOR,

Plaintiff,

v.

GLOBAL WEST FUNDING, LTD., CO.,
AN OKLAHOMA LIMITED LIABILITY COMPANY;
GLOBAL WEST FINANCIAL LLC,
AN OKLAHOMA LIMITED LIABILITY COMPANY;
SURE LOCK FINANCIAL, LLC,
AN OKLAHOMA LIMITED LIABILITY COMPANY;
SURE LOCK LOANS LLC, AN OKLAHOMA
LIMITED LIABILITY COMPANY;
THE WAVE-GOLDMADE, LTD.,
AN UNINCORPORATED ASSOCIATION;
BRIAN MCKYE, AN INDIVIDUAL;
JOE DON JOHNSON, AN INDIVIDUAL; AND
JAMES FARNHAM, AN INDIVIDUAL,

Defendants,

AND

HERITAGE ESTATE SERVICE, LLC,
AN OKLAHOMA LIMITED LIABILITY COMPANY,

Relief Defendant.

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

APR 17 2009

PATRICIA PRESLEY, COURT CLERK

by _____ DEPUTY

No. CJ-2009-2773
(Civil relief more than \$10,000:
INJUNCTION / RESTRAINING ORDER)

Filed: 03/24/2009

Judge: Gurich, Noma D.

MOTION TO WITHDRAW

Richard L. Rose of Mahaffey & Gore P.C., ("Rose") hereby moves this Court for an Order withdrawing his appearance as counsel for Defendant, James Farnham ("Farnham"), an individual, and shows the Court:

1. Movant previously entered his appearance for Farnham in this action.
2. Movant also entered his appearance on behalf of McKye and McKye's related entities in this action and his representation of these Defendants will continue.
3. A potential conflict has developed between the Defendants, as such, Mr. Rose is unable to represent both McKye and Farnham.
4. As soon as movant became aware of the possible conflict he contacted the Bar

Ethics counsel, who informed movant that he should withdraw as counsel for Mr. Farnham. However, because of his previous representation of McKye and McKye's related entities movant could still continue to represent McKye.

5. Movant believes that he can continue to represent McKye in this case without conflict.

6. There is currently an accounting, and soon an Answer, due from James Farnham which should be continued until Mr. Farnham has found new counsel.

7. The undersigned counsel hereby certifies that he has personally apprised his client James Farnham of his intention to withdraw and informed Mr. Farnham that he must locate new counsel or file a pro se entry within thirty (30) days of the date of withdrawal.

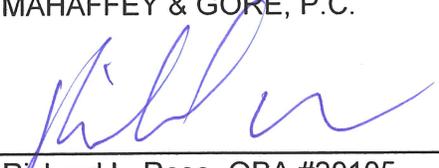
8. The undersigned counsel has notified Plaintiff's counsel of his intent to withdraw and Plaintiff's counsel has no objections.

9. Movant's withdrawal as counsel for Farnham will create no substantial delay in this case.

WHEREFORE, Richard L. Rose of Mahaffey & Gore P.C. requests that the Court grant his Motion to Withdraw as counsel for Defendant, James Farnham.

Respectfully submitted,
MAHAFFEY & GORE, P.C.

Dated: April 17, 2009

By: 

Richard L. Rose, OBA #20105
MAHAFFEY & GORE, P.C.
300 N.E. 1st Street
Oklahoma City, Oklahoma 73104-4004
Telephone: (405) 236-0478
Facsimile: (405) 236-1520 or (405) 236-1840
ATTORNEYS FOR DEFENDANTS
Brian McKye; James Farnham; Sure Lock Loans
LLC; Sure Lock Financial, LLC; Global West
Funding, Ltd., Co.; and Global West Financial LLC

CERTIFICATE OF MAILING

On April 17, 2009, I served a copy, with all exhibits, of the following document(s), ***Motion to Withdraw***, on the interested parties by:

<input checked="" type="checkbox"/>	U.S. Mail	
<input checked="" type="checkbox"/>	First class delivery	
<input type="checkbox"/>	Certified Mail, Return Receipt Requested	_____
<input type="checkbox"/>	Personal Service	
<input type="checkbox"/>	Facsimile	
<input type="checkbox"/>	E-mail	
<input type="checkbox"/>	Overnight Delivery	Tracking Number
<input type="checkbox"/>	Federal Express	_____
<input type="checkbox"/>	UPS, Next Day Air	_____
<input type="checkbox"/>	Express Mail	_____

addressed as follows:

Patricia A. Labarthe, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102
Telephone: (405) 280-7700
Facsimile: (405) 280-7742
***Attorneys for Plaintiff, Oklahoma
Department of Securities ex rel. Irving L.
Faught, Administrator***

R. Scott Adams, Esq.
City Place Building
204 North Robinson Twenty-Fifth Floor
Oklahoma City, Oklahoma 73102
Telephone: (405) 232-9100
Facsimile: (405) 232-9114
***Attorneys for Defendant, Joe Don
Johnson***

Steven Moriarty, Esq., Special Master
Andrews Davis
100 North Broadway, Suite 3300
Oklahoma City, Oklahoma 73102
Telephone: (405) 272-9241
Facsimile: (405) 235-8786
Special Master

James Farnham
6308 N. Harvard Avenue
Oklahoma City, Oklahoma 73122
In Propria Persona

By: _____


Richard L. Rose

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STATE OF OKLAHOMA**

OKLAHOMA DEPARTMENT OF SECURITIES
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BRIAN MCKYE, AN INDIVIDUAL;
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No. CJ-2009-2773
(Civil relief more than \$10,000:
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Filed: 03/24/2009

Judge: Gurich, Noma D.

**ORDER ALLOWING WITHDRAW OF RICHARD L. ROSE
AS COUNSEL FOR JAMES FARNHAM**

The cause is before the court on motion of Richard L. Rose to withdraw as counsel for James Farnham. After hearing from counsel, and with no objection from James Farnham or counsel for any other party, the court finds that good cause has been shown and that the application should be granted.

This case has been pending for less than six months. All pleadings are filed and discovery is underway. No hearings are pending, and the case is not set for trial.

IT IS THEREFORE ORDERED that Richard L. Rose is hereby allowed to withdraw as attorney of record for James Farnham, and Richard L. Rose is no longer the attorney of record

for James Farnham. James Farnham's address for service is:

James Farnham
6308 N. Harvard
Oklahoma City, OK 73122

IT IS FURTHER ORDERED that James Farnham shall, within thirty (30) days of this order, either (a) secure an entry of appearance by other counsel, or (b) enter an appearance in his own name, by filing an entry of appearance with the court clerk showing an address where all further papers in this case may be served upon him, and serve such entry of appearance on counsel for all other parties, at the following addresses:

Patricia A. Labarthe, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102
Telephone: (405) 280-7700
Facsimile: (405) 280-7742
**Attorneys for Plaintiff, Oklahoma
Department of Securities ex rel. Irving L.
Faught, Administrator**

R. Scott Adams, Esq.
City Place Building
204 North Robinson Twenty-Fifth Floor
Oklahoma City, Oklahoma 73102
Telephone: (405) 232-9100
Facsimile: (405) 232-9114
**Attorneys for Defendant, Joe Don
Johnson**

Steven Moriarty, Esq., Special Master
Andrews Davis
100 North Broadway, Suite 3300
Oklahoma City, Oklahoma 73102
Telephone: (405) 272-9241
Facsimile: (405) 235-8786
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300 N.E. 1st Street
Oklahoma City, Oklahoma 73104-4004
Telephone: (405) 236-0478
Facsimile: (405) 236-1520 or (405) 236-1840
**Attorneys for Defendants, Brian McKye;
Sure Lock Loans LLC; Sure Lock
Financial, LLC; Global West Funding, Ltd.,
Co.; and Global West Financial LLC**

IT IS FURTHER ORDERED that upon execution of this order, and until such time as James Farnham exercises one of these options, all proceedings in this cause are stayed, provided that this stay shall not last beyond 30 days from the entry of this order, and service of all documents filed in this cause may be accomplished by mailing a copy of such documents to James Farnham, at his last known address, 6308 N. Harvard Avenue, Oklahoma City, OK 73122 in accordance with 12 O.S. § 2005(B). Service of this order shall be made upon James

Farnham by certified mail, return receipt requested.

DATED this ____ day of April, 2009.

District Court Judge

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