

July 16, 2009 1:30pm

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

IN THE DISTRICT COURT OF OKLAHOMA COUNTY JUN - 5 2009
STATE OF OKLAHOMA

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

OKLAHOMA DEPARTMENT OF)
SECURITIES, *ex. rel.* Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
vs.)
)
GLOBAL WEST FUNDING, LTD., CO.,)
an Oklahoma limited liability company, et al.,)
)
Defendants.)

Case No. CJ-2009-2773

MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANTS HERITAGE ESTATE SERVICE LLC,
JOE DON JOHNSON AND JAMES FARNHAM

Plaintiff moves this Court to enter judgment by default in its favor and against Defendants Heritage Estate Service LLC, Joe Don Johnson and James Farnham (collectively, "Heritage Defendants") for the relief prayed for in the *Petition for Permanent Injunction and Other Equitable Relief* and in the *First Amendment to Petition for Permanent Injunction and Other Equitable Relief*. In support of this motion, Plaintiff states as follows:

1. On March 24, 2009, a *Petition for Permanent Injunction and Other Equitable Relief* (Petition) was filed against Defendants Joe Don Johnson and James Farnham and against Heritage Estate Service LLC as a Relief Defendant.
2. On March 24, 2009, a *Temporary Restraining Order, Order Freezing Assets and Order for Accounting* (Order) was issued by this Court against the Heritage Defendants.
3. On March 30, 2009, Heritage Estate Service LLC was served with the Petition and Summons by certified mail.
4. On March 31, 2009, an Entry of Appearance was filed by Richard L. Rose on behalf of James Farnham.
5. On April 1, 2009, an Entry of Appearance was filed by Scott Adams on behalf of Joe Don Johnson and Heritage Estate Service LLC.

6. On April 10, 2009, Plaintiff filed the *First Amendment to Petition for Permanent Injunction and Other Equitable Relief* (Amended Petition) and named Heritage Estate Service LLC as a Defendant.
7. On April 13, 2009, Richard L. Rose, attorney for James Farnham, received the Amended Petition. On April 14, 2009, Scott Adams, attorney for Heritage Estate Service LLC and Joe Don Johnson, received the Amended Petition.
8. On April 22, 2009, an order allowing withdrawal of Richard L. Rose as attorney for James Farnham was entered by the Court. To date, neither James Farnham nor any attorney on his behalf has filed an entry of appearance and the time for doing so has expired.
9. On April 23, 2009, an *Order Modifying, In Part, the Temporary Restraining Order, Order Freezing Assets and Order for Accounting and Appointing Special Master* (Modification Order) was issued by the Court appointing a Special Master over the assets of Heritage Estate Service LLC and Joe Don Johnson.
10. The Heritage Defendants have failed to answer or otherwise plead to the Petition or Amended Petition, and their time for doing so has expired.
11. Plaintiff requests that the Heritage Defendants be ordered to pay restitution to any and all investors who purchased securities in the nature of notes (Investment Notes) from the Heritage Defendants or who transferred money to the Heritage Defendants for the purpose of purchasing the Investment Notes or otherwise making investments on their behalf.
12. Plaintiff further requests that the Heritage Defendants be prohibited from offering and/or selling securities in any capacity in and/or from this state.
13. Plaintiff further requests that all previous relief granted in the Order and Modification Order, including the asset freeze and the appointment of the Special Master, remain in place as to the Heritage Defendants.

A copy of this motion has been sent by certified mail to Scott Adams, attorney of record for Defendants Heritage Estate Services LLC and Joe Don Johnson; and to James Farnham at his last known address of record.

WHEREFORE, premises considered, Plaintiff prays for the Court to grant the following relief:

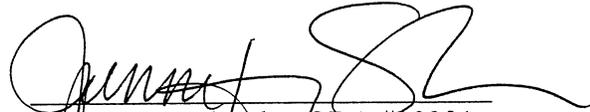
I.

That judgment by default be entered in its favor and against the Heritage Defendants for restitution to all investors who purchased Investment Notes from the Heritage Defendants or who transferred money to the Heritage Defendants for the purpose of purchasing the Investment Notes or otherwise making investments on their behalf; and

II.

That the Heritage Defendants be permanently enjoined from offering and/or selling securities in any capacity in and/or from this state.

Respectfully submitted,



Patricia A. Labarthe, OBA #10391
Jennifer Shaw, OBA # 20839
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
(405) 280-7700

CERTIFICATE OF MAILING

The undersigned certifies that on the 5th day of June, 2009, a true and correct copy of the foregoing was mailed by first class mail, with postage prepaid thereon, addressed to:

Brian McKye
PO Box 957
Jay, OK 74346
Pro Se

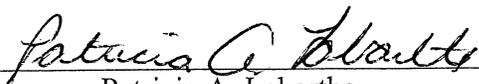
Global West Funding, Ltd.;
Global West Financial, LLC;
Sure Lock Financial, LLC;
Sure Lock Loans, LLC;
The Wave Gold-Made, Ltd.;
PO Box 60725
Oklahoma City, OK 73146

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