

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

JUL 29 2008

PATRICIA PRESLEY, COURT CLERK

by ~~DEPUTY~~

Oklahoma Department of Securities,)
 ex rel. Irving L. Faught, Administrator,)
)
 Plaintiff,)
)
 vs.)
)
 Accelerated Benefits Corporation, a Florida)
 corporation, et al.,)
)
 Defendants.)

Case No. CJ-99-2500-66
Judge Daniel Owens

MOTION TO WITHDRAW OF WENDY P. HIGGINS

COMES NOW, Wendy P. Higgins, and moves the Court for an Order withdrawing her appearance as counsel for Conservator of Accelerated Benefits Corporation, H. Thomas Moran, II ("Conservator"), and shows the Court as follows:

1. Wendy P. Higgins, of the firm of Phillips McFall McCaffrey McVay & Murrah, P.C., previously entered her appearance for Conservator in this action;
2. Ms. Higgins is leaving her employment with the firm of Phillips McFall McCaffrey McVay & Murrah, P.C.;
3. Kenneth A. Tillotson of the firm of Phillips McFall McCaffrey McVay & Murrah, P.C., who has previously entered his appearance, will continue to represent Conservator in this matter; and
4. Conservator has been notified of this withdrawal and the continuing representation by Phillips McFall McCaffrey McVay & Murrah, P.C.

WHEREFORE, premises considered, Wendy P. Higgins prays that the Court grant her Motion to Withdraw as counsel for Conservator of Accelerated Benefits Corporation, H. Thomas Moran, II.

Respectfully submitted,



Melvin R. McVay, Jr., OBA No. 06096

Wendy P. Higgins, OBA No. 21697

Kenneth A. Tillotson, OBA No. 19237

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Attorneys for Conservator Tom Moran

CERTIFICATE OF SERVICE

The undersigned certifies that on the 29th day of July, 2008, a true and correct copy of the above and foregoing was served, via U.S. First-Class Mail, postage prepaid, to the following:

Patricia A. Labarthe, Esq.
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