

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

AUG 18 2003

PATRICIA PRESLEY, COURT CLERK
by Deputy

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

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
Judge Daniel L. Owens

**CONSERVATOR'S OBJECTION TO THE MOTION TO INTERVENE FILED
BY THE JEAN MARIE AKIN IRREVOCABLE LIFE INSURANCE TRUST**

Conservator, Tom Moran, hereby respectfully offers the following objection to the Motion to Intervene (the "Motion") filed by The Jean Marie Akin Irrevocable Life Insurance Trust (the "Akin Trust"). In support thereof, the Conservator shows the Court as follows:

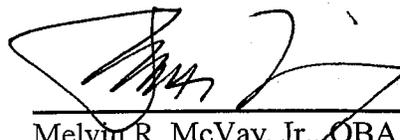
1. The Motion was filed by the Akin Trust on July 31, 2003.
2. The Motion alleges that the Akin Trust holds a beneficial interest in the proceeds of a life insurance policy covering the life of Jean Marie Akin (the "Policy"), now deceased.
3. The Policy was one of the viatical policies held by the Conservator for which the Court approved the sale on December 21, 2002.
4. Jean Marie Akin passed away following the Court's Order Approving Sale of Conservatorship Assets.
5. To date no proceeds have been paid to the Conservator on the Policy.
6. The Motion further alleges that the Akin Trust, as a matter of right, is entitled to intervene in this action to assert its claim upon the proceeds of the Policy.

7. The Conservator is in the process of gathering information relating the claims of the Akin Trust and at this time does not have sufficient information to determine whether intervention would be proper in this matter, and therefore, objects to the intervention.

8. The Conservator reserves the right to supplement his objection following the completion of his investigation.

WHEREFORE, premises considered, Conservator, Tom Moran, respectfully requests this Court deny the Motion to Intervene.

Respectfully submitted,



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ATTORNEYS FOR CONSERVATOR,
TOM MORAN

CERTIFICATE OF MAILING

The undersigned certifies that on the 18th day of August, 2003, a true and correct copy of the foregoing Application was hand-delivered, to

Lawrence A. G. Johnson, Esq.
2535 East 21st Street
Tulsa, OK 74114
Attorney for Jean Marie Akin Irrevocable Life
Insurance Trust.

Patricia A. Labarthe, Esq.
Oklahoma Department of Securities
First National Center, Suite 860
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Attorney for Plaintiff

Dino E. Viera, Esq.
Fellers, Snider, Blankenship,
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Attorney for Defendants,
Accelerated Benefits Corporation,
American Title Company of Orlando,
C. Keith LaMonda and
David S. Piercefield

A handwritten signature in black ink, appearing to read "Dino E. Viera", is written over a horizontal line.