IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

DEC - 2 2003

PATRICIA PRESLEY, COURT CLERK
By _____ Deputy

Oklahoma Department of Securities, ex rel. Irving L. Faught, Administrator,	)	
Plaintiff,	)	
v.	)	**Case No. CJ-99-2500-66**
Accelerated Benefits Corporation, a Florida corporation, et al.,	)	
Defendants.	)	

MOTION TO WITHDRAW

Conner L. Helms, Gary R. Underwood, and Rebecca A. Farris of the law firm Helms & Underwood move the Court for leave to withdraw their appearances as counsel of record for ABC Investors John C. Hinkle and Wanda B. Hinkle (collectively referred to herein as the "Hinkles"), and in support, state as follows:

1. The Hinkles retained counsel in an attempt to obtain information about the policies in which they had invested and evaluate possible options, such as removing the policies from the conservatorship, as said policies did not appear to be a burden on the conservatorship with respect to premium payments. Ultimately, the Court would not allow the Hinkles to be treated differently than other ABC investors or the policies in which they invested to be treated differently than the other policies in the conservatorship.

2. The undersigned counsel certifies that the Hinkles have knowledge of their intent to withdraw.

3. To this counsel's knowledge, this case is not currently set for motion docket, pretrial conference, or trial.

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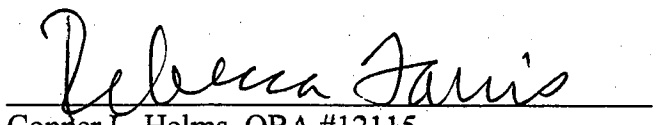
WHEREFORE, the undersigned counsel respectfully request that the Court grant them leave to withdraw as counsel for ABC Investors John C. Hinkle and Wanda B. Hinkle.

Respectfully submitted,



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ATTORNEYS FOR JOHN C. HINKLE
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was mailed, this 2nd day of December, 2003, to the following:

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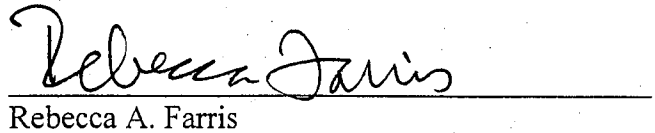

Rebecca A. Farris