

IN THE DISTRICT COURT OF OKLAHOMA COUNTY

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

STATE OF OKLAHOMA

FEB - 2 1998

PATRICIA HILLSLEY, COURT CLERK

By

~~Deputy~~

OKLAHOMA DEPARTMENT OF)
SECURITIES, ex rel. Irving L. Faught,)
Administrator,)

Plaintiff,)

vs.)

Case No. CJ-98-373-62

RANDALL D. JEFFERS and)
RENAISSANCE U.S.A., INC.,)

Defendants.)

**JOINT APPLICATION FOR CONTINUATION OF HEARING
AND APPLICATION FOR EXTENSION OF ANSWER AND RESPONSE DATES**

The Defendant, Renaissance U.S.A., Inc. ("Renaissance"), and Plaintiff, Oklahoma Department of Securities ("Department"), respectfully request this Court continue the hearing on Plaintiff's Temporary Restraining Order and Preliminary Injunction for five (5) weeks, or until March 20, 1998. Renaissance and the Department further request this Court to grant Renaissance an extension of twenty-nine (29) days, or until March 6, 1998, to file an answer or response to the Department's Petition for Permanent Injunction and Other Equitable Relief, and an extension of thirty-two (32) days, or until March 6, 1998, to file its response to the Department's Combined Motion for Temporary Restraining Order and Temporary Injunction and Brief in Support, and the Department has until March 13, 1998, to file its reply. In support of this Application, the parties assert:

1. Renaissance and the Department had earlier filed a Joint Application for Continuance of Hearing on January 23, 1998, which was granted by the Court. The hearing is current scheduled for February 13, 1998.

2. Renaissance and the Department have met and have agreed to this additional continuance and request for an extension in an effort to resolve the issue presented without expending judicial resources involved in a hearing on this matter.

3. It is in the interest of justice and judicial expediency that the hearing and the deadlines for answering and responding be continued.

4. Plaintiff and Defendant have agreed that the Temporary Restraining Order entered on January 16, 1998, by the Court should remain in effect until the hearing is conducted by the Court or the matter is resolved.

Therefore, for the reasons set forth above, the Department and Renaissance respectfully request this Court enter its order continuing this matter to March 13, 1998, extending Renaissance's answer and response date to the Department's Petition for Permanent Injunction and Other Equitable Relief to March 6, 1998, and extending Renaissance's response date to the Department's Combined Motion for Temporary Restraining Order and Temporary Injunction and Brief in Support to March 6, 1998, and the Department will file a reply on or before March 13, 1998.

Respectfully submitted,



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