

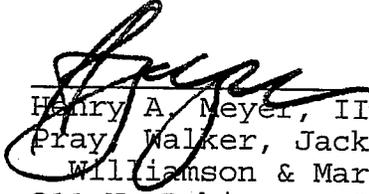
Motion to Withdraw and a proposed Order which reflects that transmittal by regular mail or correspondence to that address by the Department constitutes good service during the pendency of the action of this case on Mr. Jeffers.

- (4) The attorney for Mr. Jeffers has not had communication via telephone with Mr. Jeffers, and does not know of his whereabouts, but has attempted to make contact.
- (5) Attached are two (2) Motions, both by the Oklahoma Department of Securities setting the matter on the trial docket and Motion to Set Citation for Criminal Contempt against Randall D. Jeffers, both of which were sent to the Attorney of Record, Henry A. Meyer, III, on May 24, 1999, subsequent to a letter that was sent to the Department dated May 13, 1999, with a draft, the copy of which is marked as Exhibit #1, telling the State of Oklahoma that this firm has not been paid and as such should be allowed to withdraw.

Wherefore premises considered, counsel prays that this Motion be granted over the objection of the State and that counsel not be made an unwilling, unemployed, co-counsel for the Department of Securities to ensure service of process can be made upon Mr. Jeffers without Mr. Jeffers consent or agreement.

Respectfully submitted,

By:


Henry A. Meyer, III, OBA #6163
Pray Walker, Jackman,
Williamson & Marlar
211 N. Robinson, Suite 1601
Oklahoma City, OK 73102-7127
(405) 236-8911
COUNSEL FOR DEFENDANT JEFFERS

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the above and foregoing was mailed on the 25th day of May, 1999, to:

Mark S. Edmondson, Esq.
Enforcement Attorney
Oklahoma Department of Securities
First National Center, Suite 860
120 North Robinson
Oklahoma City, OK 73102


Henry A. Meyer, III