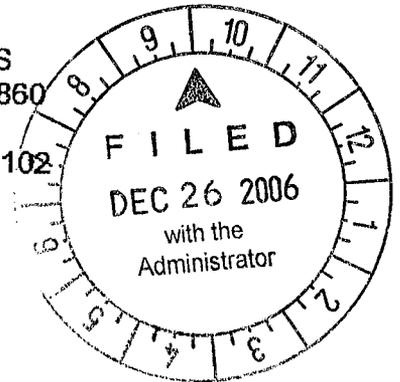


STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
FIRT NATIONAL CENTER SUITE 860
120 NOTHR ROBINSON
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Earthly Mineral Solutions, Inc.
Natural Mineral Processing Company
Roy D. Higgs, Frank L. Schwartz, and
Ricky Lawton.

ORS File No. 07-031

Respondents.

REQUEST FOR PRODUCTION

COMES NOW, Respondent Ricky Lawton, above named, and requests the production of the following documents, in accordance with general rules of discovery applicable to administrative hearings¹:

TO: SHAUN MULLINS, Enforcement Attorney
120 North Robinson, suite 860
Oklahoma City, OK 73102

1. In paragraph 6 of Findings of Fact in the Enforcement Division Recommendation [Recommendation] that respondents are representing that they are selling "Fractional Interests in Mineral Claims.

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¹ Any costs for copy or production will be advanced or paid when billed

PLEASE PRODUCE FOR INSPECTIO:

- A. Any and all documents with any modifications or updates of the materials showing such representations. Include any supplemental information if provided or available.
 - B. Include any and all transfer documents or interests being transferred.
2. In paragraph 7, of the recommendation, you have indicated that respondents are representing that there is "constant growth and "sprawl" of the city of Las Vegas, and "The trend clearly shows more than a trebling of values in a 6 year period..."

PLEASE PRODUCE FOR INSPECTION:

- A. Any and all documentation with any modifications or updates, or supporting materials indicating such representations.
 - B. Include any and all documentation the supports or verifies any representations regarding the growth, and Federal Land Sales associated with said representations.
3. In paragraph 8, of the recommendation, you indicate that respondents represent that purchaser will recieve a claim in a area pre-designated by EMS. Also that EMS with their "knowledge and expertise" will maintain the claims in good standing.

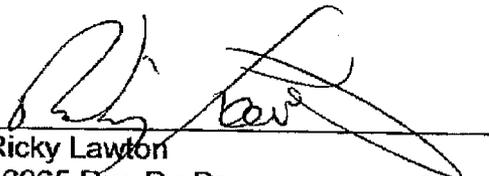
PLEASE PRDUCE FOR INSPECTION:

- A. Any and all documentation with any modification or updates, or supporting material regarding the representations.
 - B. Include any and all documentation explaining or supporting the representations.
4. In paragraph 7, of the recommendation, you indicate .."to provide investment returns,...the purchaser may grant "NMPC a "right of first refusal..."

PLEASE PRODUCE FOR INSPECTION:

- A. Any and all documentation with any updates, or modifications, or supporting material regarding the representations, include if available options regarding the consideration for said "first right of refusal." (i.e. additional land option)
- B. Include any and all documentation explaining the "first right of refusal," and the purpose of said agreement.

DATED: This 26th day of December, 2006.



Ricky Lawton
 16965 Rue Du Parc,
 Reno, Nevada 89511
 (775) 849-9940
 (775) 849-9942

RICKY LAWTON
16965 Rue Du Parc
Reno, Nevada 89511
(775) 849-9940
(775) 849-9942 (fax)

December 26, 2006

SHAUN MULLINS ESQ.
Enforcement Attorney
120 North Robinson, suite 860
Oklahoma City, OK 73102

VIA FACSIMILE and MAILING: (405) 280-7742

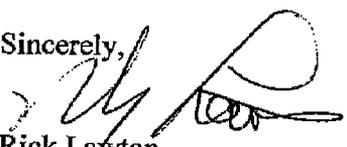
Dear Mr. Mullins:

Please find attached my first request for productions. Please let me know if I will need to forward you any funds for copies or reproduction costs for presenting me with copies of the requested materials.

Also, as you know I have requested an extension of the hearing date to have adequate time to receive and exchange adequate discovery so we may all present all evidence necessary in support of our positions.

If possible we may want to communicate as to a mutual acceptable new date that would accommodate you, the hearing judge, and the respondents.

Sincerely,


Rick Lawton

(775) 232-1330 (cell)

RICKY LAWTON
16965 Rue Du Parc
Reno, Nevada 89511

facsimile transmittal

To: Shaun M. Mullins Esq **Fax:** (405) 280-7742

From: Rick Lawton **Date:** 12/26/2006

Re: ODS file NO 07-031 **Pages:** 5

CC:

Urgent For Review Please Comment Please Reply Please Recycle

Attached first requests for production

And correspondence

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