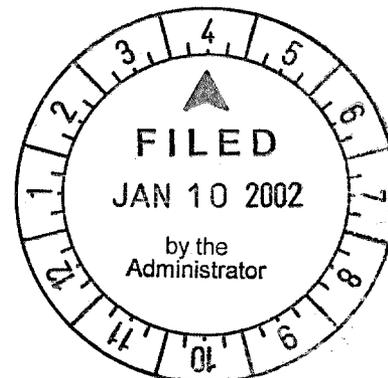


STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
ADMINISTRATOR
First National Center, Suite 860
120 North Robinson
Oklahoma City, Oklahoma 73102



In the Matter of:

Southmark of Tulsa, Inc.,
Wendell D. Belden, and
Gertrude M. Edwards,

Respondents,

File No. ODS 01-150

**OBJECTION TO THE OKLAHOMA DEPARTMENT OF SECURITIES' NOTICE
TO TAKE DEPOSITION AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

Comes now the undersigned attorney on behalf of Respondents,

Southmark of Tulsa, Inc.,
Wendell D. Belden, and
Gertrude M. Edwards,

On this 10th day of January, 2002 and object to the State's request. This Request was received on January 8, 2002. The request is for production of thousands of documents to be produced on Monday morning. It would be physically impossible to fulfill this request.

Furthermore, the request is unreasonable. Southmark's procedures for new accounts are unchanging. The State is aware of the forms used. Thousands of redundant forms are not necessary. The Respondents have attempted to accommodate the State's legitimate needs with stipulations or the use of samples.

The request would unfairly burden the Respondents and should be denied.

Respectfully Submitted,



Steven L. Hunt
Esquire
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Tulsa, Oklahoma 74135
918-492-5541