

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities
ex rel. Melanie Hall, Administrator,

Plaintiff,

v.

Premier Global Corporation et al.,

Defendants.

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

OCT 19 2023

RICK WARREN
COURT CLERK

42 _____

Case No. CJ-2022-5066

Judge Don Andrews

**SECOND MOTION TO EXTEND DEADLINE FOR
RECEIVER TO SUBMIT THIRD INTERIM FEE APPLICATION**

Eric L. Johnson (the “Receiver”) in his capacity as Receiver for Premier Global Corporation f/k/a Premier Construction Services, Inc., Premier Factoring, LLC, PF-2, LLC, PF-3, LLC, PF-4, LLC, PF-5, LLC, PF-6, LLC, PF-7, LLC, Premier Factoring Group, LLC, KCI Business Services, LLC, DDI Advisory Group, LLC, Steven J. Parish, and Richard Dale Dean, (collectively, the “Receivership Defendants”) files this Second Motion to Extend Deadline for Receiver to Submit Third Interim Fee Application (“Application”). In support of his Motion, the Receiver states as follows:

1. On October 31, 2022, this Court entered an order appointing the Receiver in the present case (the “Preliminary Order”). Pursuant to the Preliminary Order, among other things, the real and personal property interests of certain of the Receivership Defendants were vested in the within receivership estate (the “Estate”). A final order (the “Final Order”) appointing receiver was entered on November 21, 2021.

2. Pursuant to the Preliminary Order and the Final Order, the deadline for the Receiver to provide his Third Fee Application is Friday, October 13, 2023 (the “Deadline”).

3. In addition to multiple work and personal related commitments, the Receiver and his retained professionals have been working diligently to address other deadlines and issues presented in this case, including the finalization of certain claw-back actions and the marketing and potential sale of various pieces of real estate, personal property and other property of the Receivership Estate.

4. While the Receiver originally believed he would be able to complete the Third Interim Application by October 20, 2023, he requires additional time in which to finalize the Third Interim Fee Application. The further extension is a reflection of the Receiver's October travel schedule, in particular with respect to this case where the Receiver has had to travel to both Wichita and Oklahoma City on estate business the week of October 16, 2023. The Receiver has completed the monthly statements for August and September and such statements will be circulated to the parties on October 20, 2023. However, in order to finalize the Third Interim Application including to address objections made to past monthly statements, the Receiver requests until October 27, 2023 in which to file his Third Interim Fee Application.

WHEREFORE, the Receiver requests the Court grant the Motion extending the Deadline until October 27, 2023, and grant such other and further relief as the Court deems just and proper.

Dated: October 19, 2023.

Respectfully submitted,

By: 

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CERTIFICATE OF SERVICE

This will certify that on the 19th day of October 2023, a true and correct of the above and foregoing document was mailed, postage prepaid to the following:

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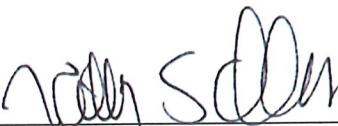
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