



THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

AUG 27 2024

RICK WARREN  
COURT CLERK  
126 \_\_\_\_\_

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

Plaintiff, )

v. )

Case No.: CJ-2022-5066  
The Honorable Don Andrews

Premier Global Corporation, a Kansas corporation, )  
formerly known as Premier Construction Services, )  
Inc., and doing business as Premier Construction )  
Billing; )  
Premier Factoring, LLC, a Kansas limited liability )  
company; )  
PF-2 LLC, a Kansas limited liability company; )  
PF-3, LLC, a Kansas limited liability company; )  
PF-4, LLC, a Kansas limited liability company; )  
PF-5, LLC, a Kansas limited liability company; )  
PF-6, LLC, a Kansas limited liability company; )  
PF-7, LLC, a Kansas limited liability company; )  
DDI Advisory Group, LLC, a Kansas limited liability )  
company; )  
Steve Jonathan Parish, an individual; )  
Richard Dale Dean, an individual; )  
Premier Marketing Management, a Kansas corporation; )  
Joshua Dane Owen, an individual; )  
J&H Holdings, LLC, a cancelled Oklahoma limited )  
liability company; )  
Kyle Blackburn, an individual; )  
Mitzimack, Inc., an Oklahoma corporation; )  
Erika Greggs, an individual; )  
Elkins & Associates Inc., an Oklahoma corporation; )  
Clyde Edward Elkins, an individual; )  
James Scott Stanley, an individual; )  
Edmond Brokerage, Inc. an Oklahoma corporation; )  
Brent Lee Worley, an individual; )  
Byron Kent Freeman, an individual; )  
Karen Lynne Freeman, an individual; and )  
Jay Michael Bogdahn, an individual, )  
Defendants. )

**AMENDED APPLICATION TO WITHDRAW AS COUNSEL OF RECORD**

COMES NOW, J. Clay Christensen, Jonathan M. Miles, Brock Z. Pittman, of the firm CHRISTENSEN LAW GROUP, P.L.L.C. (“Movants”), acting on behalf of Defendant, Jay Michael Bogdahn (“Bogdahn”), and respectfully requests this Court enter an order permitting CHRISTENSEN LAW GROUP, P.L.L.C. to withdraw as counsel of record in the above-referenced case. In support thereof, Movants show the Court as follows:

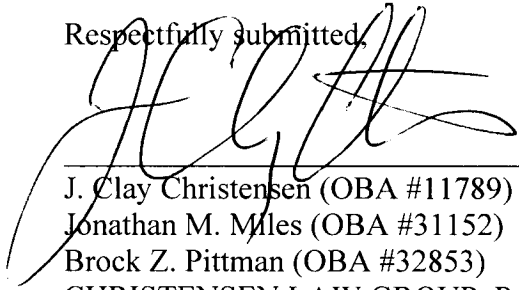
1. Movants notified Bogdahn of their intent to withdraw as counsel of record in this case on multiple occasions through email and voicemail, and Bogdahn will receive a copy of this Motion, as evidenced on the Certificate of Mailing affixed to this Motion and pursuant to 12 O.S. § 2005.2 (2022)(C).

2. Movants have notified Bogdahn that under 12 O.S. § 2005.2 he needs to retain substitute counsel or file an entry of appearance within thirty (30) days from the date of the order permitting withdrawal.

3. All parties in the above-captioned matter will receive a copy of this Motion, as evidenced on the Certificate of Mailing affixed hereto and pursuant to 12 O.S. § 2005.2 (2022)(C).

WHEREFORE, Movants respectfully requests that the Court enter an Order granting this Application and permitting CHRISTENSEN LAW GROUP, P.L.L.C. to withdraw as counsel of record for Defendant, Jay Michael Bogdahn. A proposed Order has been submitted herewith.

Respectfully submitted,



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J. Clay Christensen (OBA #11789)

Jonathan M. Miles (OBA #31152)

Brock Z. Pittman (OBA #32853)

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*Attorneys for Defendants J&H Holdings, LLC; Kyle Blackburn; Mitzimack, Inc.; Erika Greggs; James Scott Stanley; Edmond Brokerage, Inc.; Jay Michael Bogdahn; Brent Lee Worley; Byron Kent Freeman; and Karen Lynn Freeman*

**CERTIFICATE OF MAILING**

This shall certify that on this 27<sup>th</sup> day of August, 2024, a true and correct copy of the above and the foregoing was mailed, via U.S. Mail, postage prepaid, to the following:

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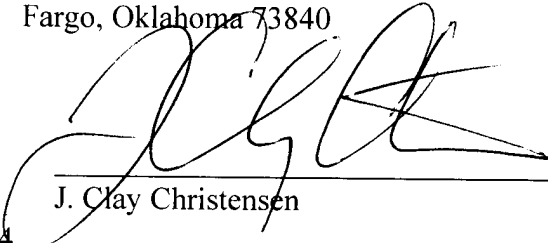
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