

APR 22 2025

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

RICK WARREN
COURT CLERK

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Oklahoma Department of Securities)
ex rel. Melanie Hall, Administrator,)
)
Plaintiff,)
v.)
Premier Global Corporation, *et al.*,)
)
Defendants.)

Case No. CJ-2022-5066
Judge Don Andrews

**MOTION FOR LETTER ROGATORY AND COMMISSION
TO TAKE DEPOSITION OUT OF STATE OF NON-PARTY, ROLANDO ESPINOSA**

Plaintiff, Oklahoma Department of Securities, moves the court to issue a letter rogatory and commission to take the deposition upon oral examination of Rolando Espinosa in Texas pursuant to 12 Okla. Stat. Ann. § 3228.

1. This Motion is made on the grounds that Rolando Espinosa is located at 6821 Clear Springs Cir., Garland, TX 75044-2825 and has in his possession, custody, and control knowledge and information relevant to this action and likely to lead to the discovery of admissible evidence.

2. Plaintiff has served Defendants with a notice of deposition of Rolando Espinosa to commence on Monday, May 12, 2025 at 9:00 a.m. at Spencer Fane LLP, 5700 Granite Parkway, Suite 650, Plano, Texas 75024. A copy of the notice is attached as Exhibit A.

3. Texas has not enacted the Uniform Interstate Depositions and Discovery Act; but under Texas Rule of Civil Procedure 201.2, a court may order the taking of a deposition of a deponent in Texas for use outside the state pursuant to letters rogatory and commission to an official of the state authorized to take testimony. If Rolando Espinosa refuses to appear, the Texas court where the officer holding the commission resides has the power to subpoena Rolando Espinosa and to compel his attendance at the deposition.


4. Plaintiff asks that the appropriate authority in Texas be requested by letter rogatory to compel

the testimony of Rolando Espinosa as identified in Plaintiff's notice of deposition in accordance with the Oklahoma Discovery Code or the appropriate procedural rules of Texas.

This Motion is supported by the following authorities: 12 Okla. Stat. Ann. § 3228 and Texas Rule of Civil Procedure 201.2.

Respectfully submitted,

OKLAHOMA DEPARTMENT OF SECURITIES
Melanie Hall, Administrator

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of April 2025, a true and correct copy of the above and foregoing instrument was delivered via First Class U.S. mail, with postage fully prepaid thereon, to:

Rollin Nash, Jr.
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FILED IN DISTRICT COURT
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NOTICE OF DEPOSITION

TO: Counsel of Record for Defendants and Receiver
listed on the Certificate of Service below

Please take notice that Plaintiff, Oklahoma Department of Securities, will take the deposition upon oral examination of Rolando Espinosa, of Garland, Texas, pursuant to 12 O.S. § 3230 and Texas Rule of Civil Procedure 201.2. The deposition will take place on Monday, May 12, 2025, at 9:00 a.m. prevailing Central time at the offices of Spencer Fane LLP, which are located at 5700 Granite Parkway, Suite 650, Plano, Texas, 75024. The deposition will take place before an officer authorized to administer oaths and will continue from day to day until completed. The deposition will be recorded by stenographic means. Counsel for the parties may attend and participate in the deposition in person or via Zoom or similar videoconference means by stipulation of counsel for the parties.

Dated: 4/21/2025

Respectfully submitted,

Bradley E. Davenport

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Attorneys for Plaintiff

EXHIBIT
A

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April 2025, a true and correct copy of the above and foregoing instrument was delivered via First Class U.S. mail, with postage fully prepaid thereon, to:

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