



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

APR - 7 2023

RICK WARREN
COURT CLERK

108

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 TO EXTEND DEADLINE FOR
RECEIVER TO SUBMIT FEE RECOMMENDATIONS**

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 Motion for to Extend Deadline for Receiver to Submit Fee Recommendations (the "Motion"). 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. On March 14, 2023, the Court entered its Order on Defendant Richard Dale Dean and DDI Advisory Group LLC's Emergency Motions for Partial Lifting of Asset Freeze to Permit

Payment of Living Expenses and for Partial Lifting of Asset Free to Permit Payment of Legal Fees (the “Unfreeze Order”).

3. The Unfreeze Order established certain procedures as they related to the payment of certain legal defenses fees with respect to DDI Advisory Group, LLC and Richard Dale Dean (the “Dean Defendants”). The Unfreeze Order provides that the Receiver shall provide his recommendations and a proposed Order to the Court within ten (10) business days of receipt of billing statements by the Dean Defendants’ counsel, Crow & Dunlevy (the “Law Firm”).

4. The Law Firm sent its billing statements to the Receiver at the designated email address on March 24, 2023, so the deadline to provide the proposed Order and recommendation is April 7, 2023 (the “Deadline”).

5. The Receiver has reviewed the billing statements as they relate to the Personal Fees.¹ The Receiver informally raised several questions and concerns with the Law Firm including an application of a pre-receivership retainer. The Receiver believes, however, that he has reached an acceptable resolution with the Law Firm and is drafting the Monthly Fee Order to reflect the same.

6. The Receiver reached the resolution the morning of April 7, 2023 and with the Easter Holiday, the Receiver is requesting a short extension to finalize the proposed Monthly Fee Order and submit to the Court. The Receiver is requesting that the Deadline be extended to April 11, 2023. The Receiver has consulted with the Dean Defendants and they have no objection to the extension.

¹ A different procedure applies to services performed in assistance to the Receiver and Receivership Estates and is not implicated by this Motion.

WHEREFORE, the Receiver requests the Court grant the Motion extending the Deadline until April 11, 2023 and grant such other and further relief as the Court deems just and proper.

Dated: April 7, 2023.

Respectfully submitted,

By: /s/ Hilary Allen

Hilary S. Allen, OBA #16979

9400 N. Broadway Extension, Ste. 600

Oklahoma City, Oklahoma 73114

Phone: 405-844-9900Bell

Facsimile: 405-844-9958

Email: hallen@spencerfane.com

Attorney for the Receiver