

**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

SEP 16 2024

RICK WARREN
COURT CLERK

42 _____

Case No. CJ-2022-5066

Judge Don Andrews

**RECEIVER’S MOTION TO FILE UNREDACTED OBJECTION AND SUPPORTING
DOCUMENTS TO DEFENDANT RICHARD DALE DEAN’S MOTION TO UNFREEZE
AND/OR RELEASE CERTAIN ACCOUNTS FROM THE ORDER FREEZING ASSETS
UNDER SEAL**

Pursuant to 12 O.S. § 3226C(2) and 51 O.S. §24A.29, 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”), respectfully moves this Court to permit them to file under seal an unredacted objection and supporting documents to Defendant Richard Dean’s Motion to Unfreeze and/or Release Certain Accounts from the Order Freezing Assets Under Seal (the “Unfreeze Motion”). The supporting documents and certain information from such documents may constitute “Confidential Information” under the Court’s December 15, 2023 Stipulated Protective Order (the “Protective Order”). Receiver has filed a redacted version of the objection with the Court and is serving courtesy copies of the unredacted objection to the Plaintiffs and Defendants.

Receiver is requesting that he be permitted to file the following under seal:

1. An unredacted version of Receiver's Objection to Defendant Richard Dean's Motion to Unfreeze and/or Release Certain Accounts from the Order Freezing Assets;
2. An unredacted copy of the summary and various bank statements provided to the Receiver from Defendant Richard Dean, and
3. An unredacted copy of DDIA's General Ledgers for the period of 2018 through 2022 in both paper and electronic format.

The contents of these documents are essential for the Receiver to fully explain and prove why the Unfreeze Motion should be denied and why the additional relief requested in the Receiver's objection should be granted. The Receiver is filing this motion out of the abundance of caution and not to inadvertently violate the Protective Order.

For the above stated reasons, Receiver respectfully requests that he be permitted to file an unredacted version of Receiver's Objection to Receivership Defendant Richard Dean's Motion to Unfreeze and/or Release Certain Accounts from the Order Freezing Assets under Seal and to provide an unredacted version of the documents set forth above to the Court and Parties so that the Court can have full access to all necessary information in ruling on Defendant Dean's Motion.

Respectfully submitted,



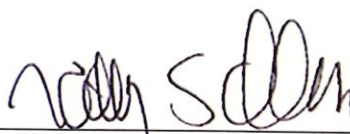
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CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of September, 2024, a true and correct copy of the above and foregoing was sent electronically to all parties requesting electronic notice and mailed to the parties who have mailing addresses and have entered an appearance.

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