



IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

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

DEC - 5 2023

RICK WARREN  
COURT CLERK

112 \_\_\_\_\_

Case No. CJ-2022-5066

Judge Don Andrews

**RECEIVER’S OBJECTION TO DEAN DEFENDANTS’  
OCTOBER MONTHLY STATEMENTS (RECEIVERSHIP FEES)**

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”) submits this objection related to the Dean Defendants’ Monthly Statement related to Receivership Fees for the month of October (the “Objection”). In support of this Objection, 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”).<sup>1</sup>

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 contains two categories of fees: (1) Dean’s personal fees rendered in defense of the litigation against him (“Personal Fees”); and (2) Fees incurred in assistance to the Receiver and the Receivership Estates (“Receivership Fees”).

4. The Unfreeze Order provides that all Parties shall submit objections within ten (10) business days of receipt of billing statements by the Dean Defendants’ counsel, Steptoe and Johnson LLP (the “Law Firm”). The Law Firm sent its billing statements to the Receiver and other parties at the designated email address on November 20, 2023, so the deadline to submit objections is December 5, 2023 (the “Deadline”). The Law Firm seeks \$4,941.06.

5. The Receiver has reviewed the billing statements as they relate to the Receivership Fees.<sup>2</sup> The Receiver objects to the following time entries:

10/2/2023	TAL	Confer regarding Kansas matter and intent to file claw backs, impact on Oklahoma case	0.80	\$	340.00
10/6/2023	AM	Continue drafting supplemental interim application of compensation for receivership fees from the Receivership Estate	1.00	\$	285.00
10/9/2023	AM	Draft reply in support of the second interim application for payment to Steptoe & Johnson of Receivership Fees	0.90	\$	256.00
10/9/2023	AM	Draft affidavit as an exhibit to the reply in support of the second interim application for fees that provides a reasoning for each entry objection stated by the Receiver	0.80	\$	228.00

---

<sup>1</sup> The Unfreeze Order initially expired on May 11, 2023, at 11:59 p.m., but has been extended to January 11, 2024, at 11:59 p.m.

<sup>2</sup> A different procedure applies to the Personal Fees.

10/11/2023	AM	Finalize and file reply in support of the second interim application for fees and the affidavit supporting same	2.40	\$	684.00
10/11/2023	AM	Finalize and file supplement to first interim application for fees to clarify the account from which Receivership Fees is paid	0.70	\$	199.50
10/19/2023	AM	Attend hearing on interim applications for fees	1.20	\$	342.00
10/19/2023	AM	Prepare for hearing on interim applications for fees	0.50	\$	142.50
10/19/2023	AM	Draft proposed order granting second interim application for fees to Steptoe & Johnson and circulate same to all parties	0.20	\$	57.00
10/20/2023	AM	Communicate with H. Allen regarding her suggested edits to the proposed order granting the second interim application for fees	0.30	\$	85.50
10/21/2023	AM	Review Receiver's August/September monthly fee statement	0.30	\$	85.50
10/30/2023	AM	Follow up with H. Allen regarding proposed order granting second interim application for fees to Steptoe as we had still not heard back from her	0.10	\$	28.50
10/31/2023	AM	Review Department's objection to the supplemental application for allowance of compensation to be paid from the Receivership Estate	0.40	\$	114.00
10/31/2023		Legal Research Expense			\$182.56
			<b>9.6</b>	<b>\$</b>	<b>\$3,030.09</b>

6. The basis of the Receiver's objections to the above entries is as follows:
- a. These tasks were not done upon the request of the Receiver or implicit in requests made by the Receiver. As stated below, several of the fees were incurred in furtherance of the Law Firm's or Mr. Dean's own benefit.
  - b. Such fees were not beneficial to the Receivership Estates. Certain of the entries are for activities where the Law Firm was actively working against the Receiver and the Receivership Estates' interests. Further, such activities actually caused the Receiver to incur additional fees. Finally, such activities appear to be for either the Law Firm's or Mr. Dean's personal benefit.
  - c. The Receiver did not authorize legal research and it is uncertain what the legal expense relates to.

7. The Segregated Legal Fund has largely been depleted with the exception of approximately \$32,000 held back as it relates to monies originally earmarked for Mr. Dean's accountant. The Receiver objects to the payment of any fees to the extent there are not sufficient funds in the Segregated Legal Fund.

WHEREFORE, the Receiver requests the Court deny fees in at least \$3,030.09 and grant such other and further relief as the Court deems just and proper.

Dated: December 5, 2023

Respectfully submitted,

SPENCER FANE LLP

By:  \_\_\_\_\_

Hilary Allen, OBA #16979

9400 N. Broadway Extension, Ste. 600

Oklahoma City, Oklahoma 73114

Phone: 405-844-9900

Facsimile: 405-844-9958

Email: [hallen@spencerfane.com](mailto:hallen@spencerfane.com)

*Attorneys for the Receiver*

## CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2023, 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.

Bruce W. Day  
Tara A. LaClair  
Mary H. Tolbert  
Aimee Majoue  
Steptoe & Johnson  
101 N. Robinson Ave, Suite 500  
Oklahoma City, OK 73102  
[Bruce.day@steptoe-johnson.com](mailto:Bruce.day@steptoe-johnson.com)  
[Molly.tolbert@steptoe-johnson.com](mailto:Molly.tolbert@steptoe-johnson.com)  
[Tara.laclair@steptoe-johnson.com](mailto:Tara.laclair@steptoe-johnson.com)  
[Aimee.Majoue@Steptoe-Johnson.com](mailto:Aimee.Majoue@Steptoe-Johnson.com)  
**Attorney for DDI Advisory Group, LLC  
and Richard Dale Dean**

Patricia A. Labarthe  
Shaun M. Mullins  
Brad Davenport  
Oklahoma Department of Securities  
204 N. Robinson, Suite 400  
Oklahoma City, OK 73102  
[plabarthe@securities.ok.gov](mailto:plabarthe@securities.ok.gov)  
[smullins@securities.ok.gov](mailto:smullins@securities.ok.gov)  
[bdavenport@securities.ok.gov](mailto:bdavenport@securities.ok.gov)  
**Attorneys for Plaintiff**

Rollin Nash, Jr.  
Dennis S. Boxeur  
Bryan C. Dixon  
Nash, Cohenour & Giessman, P.C.  
4101 Perimeter Center Drive, Ste. 200  
Oklahoma City, OK 73112  
[bdixon@nashfirm.com](mailto:bdixon@nashfirm.com)  
[dboxeur@nashfirm.com](mailto:dboxeur@nashfirm.com)  
**Attorneys for Elkins & Associates, Inc. and  
Clyde Edward Elkins**

J. Clay Christensen  
Jonathan M. Miles  
Brock Z. Pittman  
Whitney J. Dockrey  
Christensen Law Group, P.L.L.C.  
The Parkway Building  
3401 N.W. 63<sup>rd</sup> St., Suite 600  
Oklahoma City, OK 73116  
[clay@christensenlawgroup.com](mailto:clay@christensenlawgroup.com)  
[jon@christensenlawgroup.com](mailto:jon@christensenlawgroup.com)  
[brock@christensenlawgroup.com](mailto:brock@christensenlawgroup.com)  
[whitney@christensenlawgroup.com](mailto:whitney@christensenlawgroup.com)  
**Attorneys for J&H Holdings, LLC, Kyle  
Blackburn, Mitzimack, Inc., Erika Greggs,  
James Scott Stanley, Edmond Brokerage,  
Inc., Brent Lee Worley, Byron Kent  
Freeman, Karen Lynn Freeman and Jay  
Michael Bogdahn**

Jeanette C. Timmons  
Conner & Winters, LP  
1700 One Leadership Square  
211 N. Robinson Avenue  
Oklahoma City, OK 73102  
[jtimmmons@cwlaw.com](mailto:jtimmmons@cwlaw.com)  
**Attorneys for J&H Holdings, LLC, Kyle  
Blackburn, Mitzimack, Inc., Erika Greggs,  
James Scott Stanley, Edmond Brokerage,  
Inc., Brent Lee Worley, Byron Kent  
Freeman, Karen Lynn Freeman and Jay  
Michael Bogdahn**

Shawn D. Twing  
Mullin Hoard & Brown, L.L.P.  
500 S. Taylor, Suite 800  
Amarillo National Bank Plaza II  
Amarillo, TX 79101  
[stwing@mhba.com](mailto:stwing@mhba.com)  
**Attorney for Life Investors Management  
Company, LLC**

Justin R. Williams  
Overman Legal Group, PLLC  
809 N.W. 36<sup>th</sup> Street  
Oklahoma City, OK 73118  
[justinwilliams@overmanlegal.com](mailto:justinwilliams@overmanlegal.com)  
*Attorney for Joshua Dane Owen and  
Premier Marketing Management*

Steve Jonathan Parish  
1016 Summerchase Cir.  
Derby, KS 67037  
*Defendant Pro Se*

A handwritten signature in black ink, appearing to read "Hilary S. Allen", written over a horizontal line.

Hilary S. Allen