



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

JUL 13 2023

RICK WARREN
COURT CLERK

111 _____

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

Case No. CJ-2022-5066
Judge Don Andrews

**UNOPPOSED MOTION OF DEFENDANT RICHARD DALE DEAN
TO FILE OUT OF TIME RESPONSE TO RECEIVER’S APPLICATION TO EMPLOY
ASSET SERVICING GROUP, LLC AS CONSULTANT**

Defendant Richard Dale Dean (“Mr. Dean”) respectfully moves this Court for leave to file his Response to the Receiver’s Application to Employ Asset Servicing Group, LLC as Consultant (“Application”). In support thereof, Mr. Dean respectfully shows the Court as follows:

1. On June 21, 2023, the Receiver filed its Application.
2. Mr. Dean’s deadline to respond was July 10, 2023.
3. On July 10, 2023, Mr. Dean’s counsel contacted the Receiver about filing its Response to the Application after the deadline. The Receiver does not object to this Court granting Mr. Dean leave to file his Response out of time.
4. On July 13, 2023, Mr. Dean’s counsel contacted counsel for the Oklahoma Department of Securities, which also does not object to this Court granting Mr. Dean leave to file his Response out of time.
5. With the intent for the Receiver and Mr. Dean to try to reach an agreement or narrow the issues that will come before the Court and because the hearing on the Application is not set until August 4, 2023, the Receiver agrees to provide Mr. Dean with an extension to file his Response to the Application until July 21, 2023.

6. No party will suffer prejudice by this Court granting this Unopposed Motion.

7. Wherefore, premises considered, Mr. Dean respectfully requests this Court grant his Unopposed Motion for Leave to file his Response to the Receiver's Application out of time with a new deadline of July 21, 2023. A proposed order is enclosed herewith.

Dated this 13th day of July, 2023.

Respectfully submitted,



Tara A. LaClair, OBA #21903
Bruce W. Day, OBA #2238
Mary H. Tolbert, OBA #17353
Steptoe & Johnson, PLLC
101 N. Robinson Avenue, Suite 500
Oklahoma City, OK 73102
Telephone: (405) 930-5151
Facsimile: (405) 212-5843
tara.laclair@steptoe-johnson.com
bruce.day@steptoe-johnson.com
molly.tolbert@steptoe-johnson.com

**ATTORNEYS FOR DEFENDANTS RICHARD
DALE DEAN AND DDI ADVISORY GROUP,
LLC**

CERTIFICATE OF SERVICE

This certifies that on this 13th day of July, 2023, a true and correct copy of the above and foregoing was delivered to:

Patricia A. Labarthe *(via E-Mail and First Class Mail)*
Shaun Mullins
Oklahoma Department of Securities
204 N. Robinson, Suite 400
Oklahoma City, OK 73102
Attorneys for Plaintiff

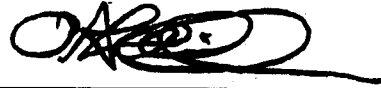
Rollin Nash, Jr. *(via E-Mail and First Class Mail)*
Dennis S. Boxeur
Nash Cohenour & Giessman, P.C.
4101 Perimeter Center Drive, Suite 200
Oklahoma City, OK 73112
*Attorneys for Defendants Elkins & Assocs. Inc.
And Clyde Edward Elkins*

J. Clay Christensen *(via E-Mail and First Class Mail)*
Jonathan M. Miles
Brock Z. Pittman
Whitney J. Dockrey
Christensen Law Group, P.L.L.C.
The Parkway Building
3401 N.W. 63rd St., Suite 600
Oklahoma City, OK 73116
*Attorneys for Defendants J&H Holdings, LLC,
Kyle Blackburn, Mitzimack, Inc., Erika Greggs,
James Scott Stanley, Edmond Brokerage, Inc.,
Brent Lee Worley, Byron Kent Freeman and
Karen Lynn Freeman*

Jeanette C. Timmons *(via E-Mail and First Class Mail)*
Connors & Winters, LP
1700 One Leadership Square
211 N. Robinson Avenue
Oklahoma City, OK 73102
*Attorneys for Defendants J&H Holdings, LLC,
Kyle Blackburn, Mitzimack, Inc., Erika Greggs,
James Scott Stanley, Edmond Brokerage, Inc.,
Brent Lee Worley, Byron Kent Freeman and
Karen Lynn Freeman*

Hilary Allen
Spencer Fane LLP
9400 North Broadway Extension
Suite 600
Oklahoma City, OK 73114
Attorney for Receiver

(via E-Mail and First Class Mail)

A handwritten signature in black ink, appearing to read 'Tara A. LaClair', written over a horizontal line.

Tara A. LaClair