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FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JAN - 8 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
Raglin Industries, LLC, an Oklahoma)
limited liability company; Phillip Levaughn)
Raglin, an individual; and Joseph Daniel)
Layne, an individual,)
)
Defendants.)
)
and)
)
Gerald Cooper, an individual;)
Diana Cooper, an individual;)
Melinda Cooper Raglin, an individual;)
BMI Construction, Co., L.L.C.,)
an Oklahoma limited liability company;)
)
Defendants Solely For)
Purposes of Equitable Relief.)

Case No.CJ-2006-10111

MOTION FOR RETURN OF FUNDS

The Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator ("Plaintiff"), and Relief Defendant Gerald Cooper (Relief Defendant) respectfully move for an order authorizing a return of investment funds to Squicor, LLC.

On February 8, 2008, funds intended for investment with Phillip Levaughn Raglin were wired from Squicor, LLC to an account at JP Morgan Chase Bank controlled by, and for which the sole signatory was, Relief Defendant Gerald Cooper. The account number is xxxxxxxxxxxx6039 (Account). At the time the funds from Squicor, LLC were deposited to the Account, the balance was \$0. No other funds were subsequently deposited into the Account.

On February 14, 2008, the funds remaining in the Account were frozen pursuant to an order of this Court (Order). The Account balance at the time of the Order was Four Thousand Three Hundred Ninety-Four Dollars and Sixty-Five Cents (\$4,394.65), consisting exclusively of the Squicor, LLC funds.

In light of the facts presented, Plaintiff and Relief Defendant respectfully request that this Court authorize JP Morgan Chase Bank to promptly return the Account balance of Four Thousand Three Hundred Ninety-Four Dollars and Sixty-Five Cents (\$4,394.65), to Squicor LLC, and to close the Account.

Respectfully submitted,



Patricia A. Labarthe OBA #10391
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
Telephone (405) 280-7700
Fax (405) 280-7742
Attorney for Plaintiff



Jerry L. Gunter
Winters, King & Associates
2448 E. 81st Street, Suite 5900
Tulsa, OK 74137-4259
Attorney for Gerald Cooper

CERTIFICATE OF MAILING

The undersigned certifies that on the 8th day of January, 2009, a true and correct copy of the foregoing was mailed by first class mail, with postage prepaid thereon, to the following:

Raglin Industries, LLC
c/o National Registered Agents, Inc. of OK
115 SW 89th Street
Oklahoma City, OK 73139

Gerald Cooper
33261 East 701 Drive
Wagoner, OK 74467-8653

and

Diana Cooper
33261 East 701 Drive
Wagoner, OK 74467-8653

33261 East 701 Drive
Wagoner, OK 74467-8653

Melinda Cooper Raglin
33261 East 701 Drive
Wagoner, OK 74467-8653

Phillip Raglin
Muskogee County Jail
122 South 3rd
Muskogee, OK 74401

James C. Hodges
Shanann Pinkham Passley
Eller & Detrich
2727 East 21st Street, Suite 200
Tulsa, OK 74114

Robert R. Nigh, Jr.
Brewster & De Angelis
2617 East 21st Street
Tulsa, OK 74114

Jerry L. Gunter
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2448 E. 81st Street, Suite 5900
Tulsa, OK 74137-4259

Patricia A. Lambert

**IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA**

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)

v.)

Case No.CJ-2006-10111

Raglin Industries, LLC, an Oklahoma)
limited liability company; Phillip Levaughn)
Raglin, an individual; and Joseph Daniel)
Layne, an individual,)
)
Defendants.)

and)

Gerald Cooper, an individual;)
Diana Cooper, an individual;)
Melinda Cooper Raglin, an individual;)
BMI Construction, Co., L.L.C.,)
an Oklahoma limited liability company;)
)
Defendants Solely For)
Purposes of Equitable Relief.)

ORDER FOR RETURN OF FUNDS

This matter came on for hearing this ____ day of _____, 200 ____, before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, on the motion of the Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator, (Plaintiff), and Relief Defendant Gerald Cooper (Relief Defendant), for an order authorizing a return of investment funds to Squicor, LLC. Plaintiff appears by and through its attorney, Patricia A. Labarthe. Relief Defendant appears by and through his attorney, Jerry Gunter. After considering the evidence, the Court finds that the return of investment funds to Squicor, LLC should be approved.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Squicor, LLC is entitled to a return of investment funds of Four Thousand Three Hundred Ninety-Four Dollars and Sixty-Five Cents (\$4,394.65), from account number 000000708316039 (Account) at JP Morgan Chase Bank.

IT IS FURTHER ORDERED that JP Morgan Chase Bank issue a cashier's check to Squicor LLC for the balance in the Account, and close the Account.

IT IS FURTHER ORDERED that JP Morgan Chase Bank mail the cashier's check to Squicor LLC, and provide a copy of the cashier's check to Plaintiff, no later than twenty (20) days from the date of this Order.

Dated this ____ day of _____, 200__.

DISTRICT COURT JUDGE

Approved as to form and substance:

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