

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

OKLAHOMA DEPARTMENT
OF SECURITIES

ex rel. Irving L. Faught,
Administrator,

Plaintiff,

vs.

TRADE PARTNERS, INC., a Michigan
corporation; TPI MANAGEMENT LLC,
a Michigan Limited Liability Company;
TRADE LLC, a Michigan Limited Liability
Company; THOMAS J SMITH; an individual;
CHRISTINE M. ZMUDKA, an individual;
SOJKARA, L.L.C., a/k/a SOJKARA ISP
INDIA L.L.C., a Michigan Limited Liability
Company; ROBERT J SEITTERS, an individual;
INTERGLOBAL WASTE MANAGEMENT,
INC., a California Corporation;
HAROLD A. KATERSKY, an individual;
ELKINS & ASSOCIATES INC., an
Oklahoma Corporation; HEARTLAND
VIATICALS, INC., an Oklahoma Corporation;
EDDIE ELKINS, an individual;
and JAMES S. STANLEY, an individual,

AUG - 6 2004

PATRICIA PRESLEY, COURT CLERK
By _____
Deputy

Case No. CJ-2004-6295

**JOINT MOTION TO VACATE TEMPORARY RETRAINING ORDER AND TO
WITHDRAW APPLICATION FOR TEMPORARY INJUNCTION
WITH RESPECT TO JAMES S. STANLEY**

Plaintiff, The Oklahoma Department of Securities ex rel. Irving L. Faught,
Administrator (the "Department") and Defendant, James S. Stanley, jointly move the Court to
dissolve the Temporary Restraining Order, Order Freezing Assets and Order for Accounting
obtained by Plaintiff on August 2, 2004, and to withdraw the Application for Temporary
Injunction filed August 2, 2004, against James S. Stanley. In support of this Motion, the
parties show the Court as follows:

1. On August 2, 2004, the Department filed its Petition for Permanent Injunction
and other Equitable Relief. On that same date, the Department filed its Application for
Temporary Restraining Order, Asset Freeze and and Temporary Injunction.

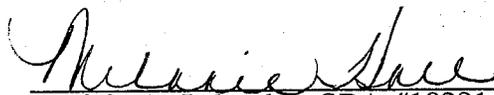
2. The Department obtained a Temporary Restraining Order, Order Freezing Assets and Order for Accounting on August 2, 2004 in this action, restraining Defendant, James S. Stanley, from, among other things, transacting business in this state as a broker-dealer or agent, pending the hearing on the Department's application that is set for August 12, 2004.

3. On August 5, 2004, a settlement between the parties with respect to the temporary restraining order, order freezing assets and order for accounting, and application for temporary injunction was reached, whereby Defendant, James S. Stanley, has agreed to post a bond or stand-by letter of credit and enter into a mutually acceptable administrative agreement with the Department during the pendency of this case.

4. Consequently, Plaintiff and Defendant jointly move that the temporary restraining order, order freezing assets and order for accounting be immediately dissolved, and that the application for temporary injunction be withdrawn.

5. A proposed Order has been submitted with this Motion for the consideration of the Court.

WHEREFORE, the parties jointly request that the Court enter its Order dissolving the temporary restraining order, order freezing assets and order for accounting, and withdrawing the application for temporary injunction as set forth herein.



Patricia A. Labarthe, OBA #10391

Melanie Hall, OBA #1209

OKLAHOMA DEPARTMENT OF SECURITIES

120 North Robinson, Suite 860

Oklahoma City, Oklahoma 73102

Attorney for Plaintiff

OKLAHOMA DEPARTMENT OF SECURITIES

ex rel. Irving L. Faight, Administrator



Sheldon B. Swan, OBA #11538
Clell I. Cunningham III, OBA #2093
DUNN SWAN & CUNNINGHAM
2800 Oklahoma Tower
210 Park Avenue
Oklahoma City, Oklahoma 73102

Attorney for Defendant,
James S. Stanley