

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,)

JAN 6 2004

Plaintiff,)

PATRICIA PRESLEY, COURT CLERK
By _____
Deputy

v.)

CJ-2003-7899

Sunset Financial Group, Inc., an Oklahoma)
corporation; Vision Services, Inc., and Oklahoma)
corporation; Amsterdam Fidelity Business Trust,)
a Nevada Limited liability partnership; EASE)
Corporation, an Oklahoma corporation; Gold Star)
Properties, Inc., an unincorporated association;)
Rebates International, Inc., a Nevada corporation;)
Betty Solomon Brokerage, Inc., an Oklahoma)
corporation; Emzie Huletty, an individual;)
Grover H. Phillips, an individual; Nicholas Krug,)
an individual; Charles E. Elliott, an individual;)
Terry Mahon, an individual; Denver Large, an)
Individual; Betty G. Solomon, an individual; and)
Donald J. Wood, an individual,)

Defendants.)

**MOTION TO COMPEL DEFENDANTS TO PRODUCE PROPERTY
AND BRIEF IN SUPPORT**

L. Win Holbrook, the duly appointed receiver in the above styled and numbered proceeding (the "Receiver"), files hereby this motion to compel production of certain receivership property currently under the custody, control and possession of Sunset Financial Group, Inc., Vision Services, Inc. (the "Receivership Defendants") and/or the agents, employees, principals or representatives of the Receivership Defendants, and/or Emzie Huletty, Grover H. Phillips, Betty G. Solomon and Donald J. Wood (the "Individual Defendants"), and in support thereof states as follows:

1. By order dated September 19, 2003, Receiver was appointed receiver of the Receivership Defendants (the "Receivership Order").

2. Pursuant to the terms of the Receivership Order, the Receiver was charged, *inter alia*, with taking "exclusive custody, control and possession of all assets and documents of, or in the possession or custody, or under the control of, the Receivership Defendants, including those assets of Receivership Defendants in the possession or custody, or under the control of, Defendants Emzie Huletty, Grover H. Phillips, Betty G. Solomon and Donald J. Wood, wherever situated."

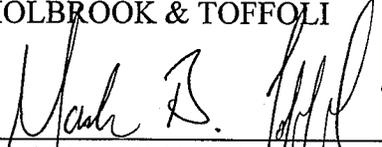
3. One of the assets of the instant receivership is a 2001 Dodge Durango, VIN 1B4HR28N21F521947 (the "Vehicle"). Said Vehicle, albeit titled in the name of an employee of the Receivership Defendants, was paid for by the Receivership Defendants. Accordingly, the Receivership Defendants possess an equitable ownership interest in and to the vehicle.

4. The original certificate of title to the Vehicle has been provided to the Receiver and has been endorsed, in blank, by the individual listed on the certificate of title. However, despite requests by the Receiver that the Vehicle be released to him, the Vehicle remains in the custody, control and possession of the Receivership Defendants and/or the Individual Defendants.

WHEREFORE, the Receiver requests the Court enter its order directing the Receivership Defendants, and/or the agents, employees, principals or representatives of the Receivership Defendants, and/or Emzie Huletty, Grover H. Phillips, Betty G. Solomon and Donald J. Wood, to produce and surrender to the Receiver the 2001 Dodge Durango, VIN 1B4HR28N21F521947 as more specifically set forth hereinabove, and grant the Receiver such other and further relief as is just, equitable and appropriate.

Respectfully submitted,

HOLBROOK & TOFFOLI


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120 North Robinson
Oklahoma City, OK 73102
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Attorneys for Receiver

NOTICE OF HEARING

Please take notice that a hearing on Receiver's motion to compel production of property has been scheduled to be heard at 1:30 P.M., on February 5, 2004, before the Honorable Carolyn R. Ricks, Oklahoma County District Court, Seventh Floor Courtroom.

CERTIFICATE OF MAILING

I hereby certify that on the 6th day of January, 2004, a true and correct copy of the above and foregoing instrument was served via first class United States mail, postage prepaid, on the following:

Ms. Patricia A. LaBarthe
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102

P. David Newsome, Jr., Esquire
Conner & Winters
3700 First Place Tower
15 East Fifth Street
Tulsa, Oklahoma 74103

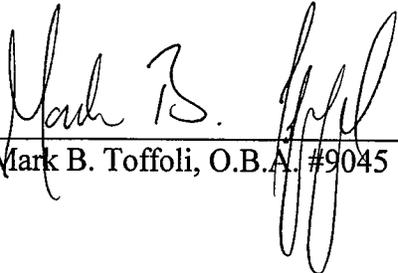
Terry D. Kordeleski, II, Esquire
Riggs, Abney, Neal, Turpen, Orbison & Lewis
5801 Broadway Extension
The Paragon Building, Suite 101
Oklahoma City, Oklahoma 73118

Mark S. Edmondson, Esquire
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100 Park Avenue, Second Floor
Oklahoma City, Oklahoma 73102

M. Michael Arnett, Esquire
L. Justin Lowe, Esquire
Arnett Law Firm
3133 N.W. 63rd Street
Oklahoma City, Oklahoma 73116

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6412 N. Santa Fe, Suite B2
Oklahoma City, Oklahoma 73116

Vision Services, Inc.
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