

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
THE FIRST NATIONAL CENTER
120 NORTH ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:

Geary Securities, Inc. fka Capital West Securities, Inc.;
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

ODS File No. 09-141

**THIRD PARTY DIRECTORS' REPLY IN SUPPORT OF
MOTION FOR RECONSIDERATION**

The Third Party Directors, by and through undersigned counsel, for their Reply to the Geary Respondents' Response to Third Party Directors' Motion for Reconsideration, state as follows:

The Third Party Directors no longer appear on the Department's final list of witnesses. Packed with baseless, rank speculation as to why, the Geary Respondents' Response does nothing to alter this critical fact. Further, the fact that the Geary Respondents "submitted a request to the Administrator to seek enforcement of the deposition subpoenas" has no bearing on the Third Party Directors' present motion. Moreover, the request referenced in the Response lacked any legal basis or justification. In fact, the Administrator denied the Geary Respondents' Application for Judicial Enforcement of the Subpoenas on April 5, 2012.

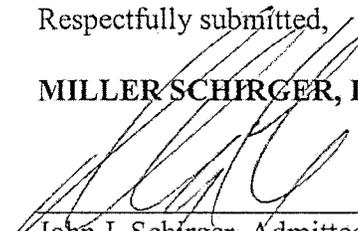
The Third Party Directors do not "invite[] the Hearing Officer to deprive the Geary Respondents of their rights to discovery, due process and fundamental fairness." Instead, the Third Party Directors invite the Hearing Officer to recognize and protect their rights as third parties against being subjected to unreasonably cumulative and duplicative, burdensome, and

harassing discovery. For the reasons stated in the Third Party Directors' initial Brief in Support of Motion to Quash and for Protective Order and their subsequent reply, both of which are incorporated and restated as though fully set forth herein, the depositions of the Third Party Directors are all of these. The Third Party Directors' Motion for Reconsideration should be granted and the subpoenas issued for their depositions quashed.

Dated: April 9, 2012.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of April, 2012, a copy of the foregoing document was emailed and mailed, with postage prepaid to:

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