

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

OKLAHOMA DEPARTMENT OF SECURITIES )  
ex rel. IRVING L. FAUGHT, Administrator, )  
 )  
Plaintiff, )

vs. )

Case No. CJ-2006-10111  
Judge Carolyn R. Ricks

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. )

**ANSWER**

COMES NOW Defendant BMI Construction Co., L.L.C., (“BMI”) and for its Answer to Plaintiff’s First Amendment to Petition for Permanent Injunction and Other Equitable Relief, (“Amended Petition”) alleges and states as follows:

1. BMI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 1, 2, 3, 4, 5, and 6 of Plaintiff’s Amended Petition and therefore denies the same.

2. BMI admits the allegations contained in paragraph 7 of Plaintiff’s Amended Petition.

3. BMI denies the allegations contained in paragraph 8 of Plaintiff's Amended Petition.

4. BMI has responded above to paragraphs 1 through 8 of Plaintiff's Amended Petition and no further response is required. BMI is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraphs 1 through 29 of Plaintiff's Petition and therefore denies the same.

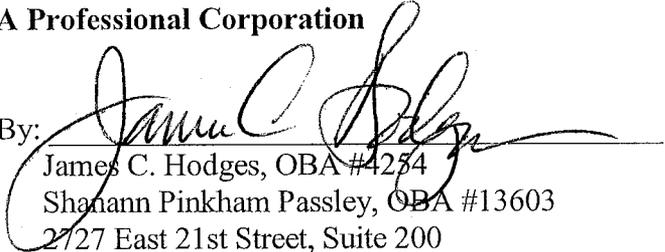
5. BMI denies the allegations contained in paragraph 10 of Plaintiff's Amended Petition.

6. BMI denies the allegations contained in paragraph 11 of Plaintiff's Amended Petition.

WHEREFORE, premises considered, Defendant BMI Construction Co., L.L.P. prays that Plaintiff take nothing by this Amended Petition, that Defendant BMI Construction Co., L.L.P. be dismissed with its costs and reasonable attorney fees and that it recover such other relief as the Court shall deem just and proper.

Respectfully submitted,

**ELLER AND DETRICH,  
A Professional Corporation**

By: 

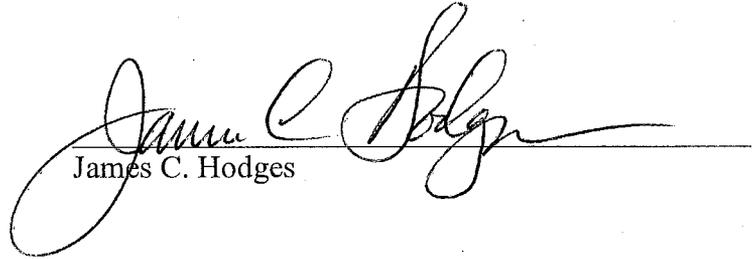
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(918) 747-8900  
(918) 747-2665 *facsimile*

**ATTORNEYS FOR DEFENDANT  
BMI CONSTRUCTION CO., L.L.C.**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 27th day of June 2008, a true and correct copy of the above and foregoing document was mailed, with proper postage affixed thereon, to the following:

Patricia A. Labarthe, Esq.  
Melanie Hall, Esq.  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102

  
James C. Hodges