

**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.)

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JAN 24 2007

Case No. CJ-2006-10111

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

MOTION FOR RETURN OF CHECKS

The Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator (“Plaintiff”) and Defendants Phillip Levaughn Raglin and Joseph Daniel Layne (collectively “Individual Defendants”) respectfully move for an order authorizing the return of checks to certain persons.

The following persons (Investors) sent checks to Raglin Industries, LLC, Phillip Levaughn Raglin and Joseph Daniel Layne (collectively “Defendants”) to purchase limited liability company membership interests in Raglin Industries LLC in November and December, 2006, in the amounts indicated below, but the checks were never deposited:

<u>Payor</u>	<u>Amount</u>	<u>Date</u>
	\$ 1,000	12/12/06
	\$ 1,000	12/12/06
	\$ 1,000	12/12/06
	\$ 3,000	12/12/06
	\$ 5,000	12/12/06
	\$ 2,000	12/12/06
	\$ 4,500	12/12/06
	\$ 2,000	12/12/06
	\$ 3,000	12/11/06
	\$ 20	12/12/06
	\$ 20	12/12/06

[REDACTED]	\$ 20	12/11/06
[REDACTED]	\$ 20	12/11/06
[REDACTED]	\$ 50	12/12/06
[REDACTED]	\$ 100	12/12/06
[REDACTED]	\$ 200	12/12/06
[REDACTED]	\$ 250	12/12/06
[REDACTED]	\$ 400	12/12/06
[REDACTED]	\$ 300	12/12/06
[REDACTED]	\$ 500	12/12/06
[REDACTED]	\$ 200	12/13/06
[REDACTED]	\$ 500	12/13/06
[REDACTED]	\$ 50	12/09/06
[REDACTED]	\$ 4,500	12/09/06
[REDACTED]	\$ 4,500	12/09/06
[REDACTED]	\$ 500	11/26/06
[REDACTED]	\$ 100	12/11/06
[REDACTED]	\$10,000	11/23/06
[REDACTED]	\$ 5,000	11/10/06
[REDACTED]	\$ 200	12/07/06
[REDACTED]	\$ 2,000	12/13/06
[REDACTED]	\$12,500	11/20/06
[REDACTED]	\$ 5,600	12/12/06
[REDACTED]	\$ 100	11/29/06
[REDACTED]	\$ 20	12/07/06
[REDACTED]	\$ 50	12/25/06
[REDACTED]	\$ 300	12/08/06
[REDACTED]	\$ 100	12/12/06
[REDACTED]	\$ 100	12/11/06
[REDACTED]	\$ 1,000	12/12/06
[REDACTED]	\$ 2,000	12/12/06
[REDACTED]	\$ 1,500	12/11/06
[REDACTED]	\$ 25	12/12/06
[REDACTED]	\$ 500	12/12/06
[REDACTED]	\$ 3,000	12/12/06

In addition, the following checks were sent by Investors to Defendants to purchase limited liability company membership interests in Raglin Industries LLC in November, 2006, in the amounts indicated below, and the checks were deposited, but the Investors requested that the bank stop payment on the checks:

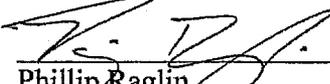
<u>Payor</u>	<u>Amount</u>	<u>Date</u>
[REDACTED]	\$ 100	11/02/06
[REDACTED]	\$ 200	11/02/06
[REDACTED]	\$ 1,000	11/06/06
[REDACTED]	\$ 200	11/09/06
[REDACTED]	\$ 100	11/09/06

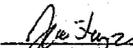
These checks were held by Defendants after receipt of service of the *Temporary Restraining Order, Order Freezing Assets and Order for Accounting* entered in this matter on December 12, 2006. All of the checks described above were turned over to Plaintiff on January 9, 2007, by the Individual Defendants.

In light of the facts presented, Plaintiff and the Individual Defendants respectfully request that this Court authorize Plaintiff to promptly return all of the Investor checks described above to the Investors listed herein.

Respectfully submitted,


 Patricia A. Labarthe OBA #10391
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 Oklahoma City, Oklahoma 73102
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 Attorney for Plaintiff


 Phillip Raglin
 33261 East 701 Drive
 Wagoner, OK 74467-8653
 (918) 231-7316
 Pro Se Defendant


 Joseph Daniel Layne
 305 NE Second St
 Wagoner, OK 74467-4411
 (918) 231-7316
 Pro Se Defendant

CERTIFICATE OF MAILING

The undersigned certifies that on the 24th day of January, 2007, 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

and

33261 East 701 Drive
Wagoner, OK 74467-8653

Patricia A. Talbot

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STATE OF OKLAHOMA**

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

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

Case No. CJ-2006-10111

ORDER FOR RETURN OF CHECKS

This matter came on for hearing this ____ day of _____, 2007, before the undersigned Judge of the District Court in and for Oklahoma County, State of Oklahoma, on the motion of Plaintiff and Defendants Phillip Levaughn Raglin and Joseph Daniel Layne (“Individual Defendants”) for an order allowing Plaintiff to promptly return checks to the investors listed in the *Motion for Return of Checks*. Plaintiff appears by and through its attorney, Patricia A. Labarthe. The Individual Defendants agree to the relief requested.

The Court, having reviewed all pleadings and submissions of the parties, finds that the motion be and hereby is granted and, therefore:

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that Plaintiff promptly return all investor checks described in the *Motion for Return of Checks* to the investors listed in the motion.

Dated this ____ day of _____, 2007.

DISTRICT COURT JUDGE

Approved as to form and substance:

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