

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.)

Case No. CJ-2006-10111

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

JAN 24 2007

PATRICIA PRESLEY, COURT CLERK
by _____ DEPUTY

**MOTION FOR RETURN AND/OR SALE OF VEHICLE,
DEPOSIT, AND ELECTRONICS**

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 and sale of a vehicle, the return of a deposit, and the return and refund of certain electronics.

On December 12, 2006, this Court issued a Temporary Restraining Order, Order Freezing Assets and Order for Accounting against Defendants Raglin Industries, LLC, Phillip Levaughn Raglin and Joseph Daniel Layne (collectively “Defendants”) (Temporary Restraining Order). On January 3, 2007, this Court issued a Temporary Injunction against Defendants. The Temporary Restraining Order and Temporary Injunction included a freeze of the assets of Defendants including, but not limited to bank accounts, vehicles and other assets.

In December, 2006, Defendants purchased a 2007 Mercedes E63 ("Mercedes") from Jackie Cooper Imports, Tulsa, Oklahoma. The value of the Mercedes will decline due to mileage increases and wear and tear. The liquidation of the Mercedes would provide funds to be paid to investors for restitution. The Individual Defendants agree to the liquidation and Jackie Cooper Imports has agreed to sell the Mercedes.

In December, 2006, Defendants submitted a deposit to Jackie Cooper Imports for the purchase of a new vehicle. The return of the deposit would provide funds to be paid to investors for restitution. The Individual Defendants agree to cancel the order and Jackie Cooper Imports has agreed to refund the deposit.

Defendants purchased electronic and computer equipment ("Equipment") from Best Buy and other retail stores. The Equipment can be returned for a refund of the purchase price and the refund of the purchase price of the Equipment would provide funds to be paid to investors for restitution. The Individual Defendants agree to the return and liquidation of the Equipment.

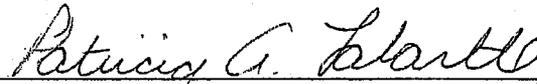
Plaintiff and Individual Defendants also move for an order partially lifting the freeze of the Raglin Industries LLC account number [REDACTED] ("Raglin Account") at Bank of America, exclusively to allow Bank of America to deposit the proceeds of the sale of the Mercedes and the Equipment into the Raglin Account.

Plaintiff and Individual Defendants request an order that the proceeds of the sale of the Mercedes and the Equipment be sent directly to Bank of America for deposit to the Raglin Account by Jackie Cooper Imports, Best Buy, and any other retail store. No proceeds will be paid to any party hereto.

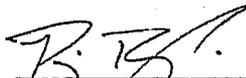
In light of the facts presented, Plaintiff and the Individual Defendants respectfully request that this Court order the return and sale of the Mercedes and Equipment, allow the refund of the

vehicle deposit and order a partial lift of the asset freeze for the purpose described above, and the deposit of the proceeds of the sales directly to the Raglin Account at Bank of America.

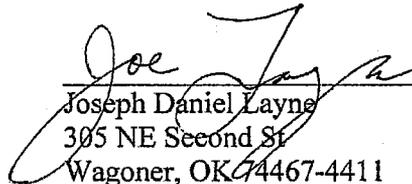
Respectfully submitted,



Patricia A. Labarthe OBA #10391
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
Telephone (405) 280-7700
Fax (405) 280-7742
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. Lantz

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

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

Plaintiff,)

v.)

Case No.CJ-2006-10111

Raglin Industries, LLC, an Oklahoma)
limited liability company; Phillip Levaughn)
Raglin, an individual; and Joseph Daniel)
Layne, an individual,)

Defendants.)

**ORDER FOR RETURN AND/OR SALE OF VEHICLE,
DEPOSIT, AND ELECTRONICS**

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 authorizing the return and sale of a vehicle, return of a deposit, and the return and refund of certain electronics. Plaintiff appears by and through its attorney, Patricia A. Labarthe. 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 Defendant Phillip Levaughn Raglin deliver the 2007 Mercedes E63 (“Mercedes”) to Jackie Cooper Imports, Tulsa, Oklahoma, within twenty-four (24) hours of this order, and that Jackie Cooper Imports sell the

Mercedes and send the proceeds of the sale directly to Bank of America, payable to Raglin Industries, for deposit to the Raglin Industries LLC account number [REDACTED] ("Raglin Account").

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Jackie Cooper Imports send the deposit on any new vehicles directly to Bank of America, payable to Raglin Industries, for deposit to the Raglin Account.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendant Phillip Levaughn Raglin return any and all electronic and computer equipment ("Equipment") purchased from Best Buy and any other retail stores, for a refund of the purchase price, and that Best Buy and any other retail store send the refunds directly to Bank of America, payable to Raglin Industries, for deposit to the Raglin Account.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Bank of America partially lift the freeze of the Raglin Account exclusively to allow Bank of America to deposit the proceeds of the sale of the Mercedes, the refund of the deposit, and the refund of the Equipment into the Raglin Account.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that no proceeds, refunds, or any other funds will be paid to any party hereto.

Dated this _____ day of _____, 2007.

DISTRICT COURT JUDGE

Approved as to form and substance:

Patricia A. Labarthe, OBA #10391
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, Oklahoma 73102
(405) 280-7700 Telephone
(405) 280-7742 Facsimile
Attorneys 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