

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

Oklahoma Department of Securities)
ex rel. Irving L. Faught,)
Administrator,)
)
Plaintiff,)
)
v.)
)
Robert E. Tucker, and)
Keystone Equity Group, Inc.,)
)
Defendants.)

**FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.**

Case No. CJ-2010-2525

DEC 13 2010

PATRICIA PRESLEY, COURT CLERK

**BY _____
DEPUTY**

PLAINTIFF'S MOTION TO SETTLE JOURNAL ENTRY AND SUPPORTING BRIEF

Plaintiff, Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator, moves to settle the journal entry to memorialize the Court's order granting Plaintiff's motion to compel answers to interrogatories and production of documents and Plaintiff's motion challenging sufficiency of Defendants' answers to requests for admissions. In support hereof, Plaintiff states as follows:

1. The Court heard arguments and granted Plaintiff's motion to compel answers to interrogatories and production of documents and Plaintiff's motion challenging sufficiency of Defendants' answers to requests for admissions, on November 23, 2010.
2. In accordance with Rule 11(D) of the Rules of the Seventh and Twenty-Sixth Judicial Districts, Plaintiff's counsel prepared the proposed Order attached hereto as Exhibit "A" and circulated it to Defendants' counsel via email on November 29, 2010, and December 1, 2010. See Exhibits "B" and "C." Defendants' counsel did not respond to either email. Plaintiff's counsel has also asked

Defendants' counsel via telephone to sign and return Exhibit "A," at least two times.

3. Defendants' counsel has not returned Exhibit "A" to Plaintiff or provided any justification for his failure to do so. Instead, Defendants' counsel represented to Plaintiff's counsel that he would sign and return Exhibit "A," each time they spoke regarding the matter.

Plaintiff therefore moves the Court to settle the journal entry for its order granting Plaintiff's motion to compel answers to interrogatories and production of documents and Plaintiff's motion challenging sufficiency of Defendants' answers to requests for admissions.

Respectfully submitted,



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Attorneys for Plaintiffs

Gerald J. Lovoi, Esq.
616 S. Boston #403
Tulsa, OK 74119
Telephone (918) 622-0031
glovoi@aol.com
Attorney for Defendants

CERTIFICATE OF MAILING

The undersigned certifies that on the 13th day of December, 2010, a true and correct copy of the foregoing was mailed by certified mail addressed to:

Gerald J. Lovoi, Esq.
616 S. Boston #403
Tulsa, OK 74119
Attorney for Defendants



Terra Shamas Bonnell

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-2010-2525
)	
Robert E. Tucker, and)	
Keystone Equity Group, Inc.,)	
)	
Defendants.)	

ORDER

This matter came on for hearing before this Court on November 23, 2010, on Plaintiff's motion to compel answers to interrogatories and production of documents ("Motion to Compel") and Plaintiff's motion challenging sufficiency of Defendants' answers to requests for admissions ("Motion Challenging Sufficiency"). After consideration of the evidence, the Court finds that good cause exists for the granting of Plaintiff's Motion to Compel and Motion Challenging Sufficiency.

IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Defendants Robert E. Tucker and Keystone Equity Group, Inc., produce all documents responsive to the document requests contained in *Plaintiff's First Set of Requests for Admissions, Interrogatories and Documents Requests to Defendants Robert E. Tucker and Keystone Equity Group, Inc.*, to Plaintiff on or before the 8th day of December, 2010.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendants Robert E. Tucker and Keystone Equity Group, Inc., serve full and complete answers to interrogatories numbered 3-4 and 8-12, in *Plaintiff's First Set of Requests for Admissions,*

EXHIBIT
"A"

Interrogatories and Documents Requests to Defendants Robert E. Tucker and Keystone Equity Group, Inc., on Plaintiff on or before the 8th day of December, 2010.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that Defendants Robert E. Tucker and Keystone Equity Group, Inc., serve full and complete amended answers to requests for admissions numbered 5, 9, 11, and 18-20, in *Plaintiff's First Set of Requests for Admissions, Interrogatories and Documents Requests to Defendants Robert E. Tucker and Keystone Equity Group, Inc.*, on Plaintiff on or before the 8th day of December, 2010.

The Court reserves ruling on Plaintiff's request for expenses included, but not limited to, attorney's fees.

Dated this ____ day of _____, 2010.

DISTRICT COURT JUDGE

APPROVED:

Melanie Hall, OBA # 1209
Terra Shamas Bonnell, OBA # 20838
Oklahoma Department of Securities
120 North Robinson, Suite 860
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(405) 280-7700
Attorneys for Plaintiff

Gerald J. Lovoi, Esq.
616 S. Boston 403
Tulsa, OK 74119
(918) 622-0031
Attorney for Defendants

Terra Bonnell

From: Terra Bonnell
Sent: Monday, November 29, 2010 9:12 AM
To: 'glovoi@aol.com'
Subject: Okla. Dept. of Securities v. Robert E. Tucker, et al. (CJ-2010-2525)
Attachments: Proposed Order.doc

Gerald:

An order for the November 23rd hearing is attached for your review.

Terra Shamas Bonnell
Enforcement Attorney
Oklahoma Department of Securities
Direct Phone: 405.280.7715
Fax: 405.280.7742
tbonnell@securities.ok.gov

EXHIBIT

"B"

Terra Bonnell

From: Terra Bonnell
Sent: Wednesday, December 01, 2010 8:51 AM
To: 'glovoi@aol.com'
Subject: FW: Okla. Dept. of Securities v. Robert E. Tucker, et al. (CJ-2010-2525)
Attachments: Proposed Order.doc

Gerald:

I am resending the proposed order for your convenience. I just realized that I didn't send it to you until a few days ago.

Terra Shamas Bonnell
Enforcement Attorney
Oklahoma Department of Securities
Direct Phone: 405.280.7715
Fax: 405.280.7742
tbonnell@securities.ok.gov

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