

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

Oklahoma Department of Securities	)	
<i>ex rel.</i> Irving L. Faught, Administrator,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CJ-2010-8906
	)	Judge Noma D. Gurich
Edward Alan Haines,	)	
	)	
Defendant,	)	
	)	
v.	)	
	)	
Sharon Kay Haines,	)	
	)	
Relief Defendant.	)	

**MOTION TO WITHDRAW AS  
ATTORNEY OF RECORD FOR THE DEFENDANT**

COMES NOW Kenneth M. Smith, attorney of record for the Defendant Edward Alan Haines, and Relief Defendant Sharon Kay Haines, and states as follows:

1. Kenneth M. Smith has previously entered his appearance for the Defendant and Relief Defendant in this case and has filed certain pleadings responding to the Plaintiff's action on its behalf.

2. Counsel for Defendant and Relief Defendant has notified his clients of his intent to withdraw and that it will be receiving notice of the Motion to Withdraw with all of the caveats contained herein.

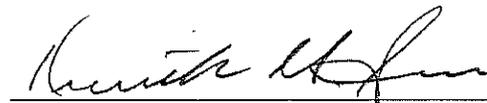
3. The reason for the withdrawal is that the clients have failed to respond to Mr. Smith's request for cooperation in responding to Plaintiff's discovery requests and, as a result thereof, said requests are unanswered. This fact alone renders his continued representation of the client untenable.

4. Defendant and Relief Defendant will have thirty (30) days from the date the Court enters an order permitting the withdrawal, to obtain new counsel or represent themselves with regard to this matter. They will be notified herein that failure to do either may result in their claims in the case being dismissed by the Court or a judgment or other relief being granted adverse to it in the case. By way of the Motion to Withdraw, Defendant and Relief Defendant is being placed on notice of the foregoing.

5. There are no other responses required by the Defendant and Relief Defendant at the present time and no current hearings are pending.

WHEREFORE, Kenneth M. Smith, the attorney for the Defendant and Relief Defendant, respectfully requests this Court enter its Order allowing his withdrawal as counsel of record for the Defendant and Relief Defendant and be relieved of further responsibilities herein.

Respectfully submitted,



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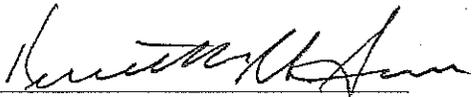
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Attorneys for Defendant and  
Relief Defendant

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 25<sup>th</sup> day of January, 2012, a true and correct copy of the above and foregoing instrument was:

mailed with postage prepaid thereon;       mailed by certified mail;  
 transmitted via facsimile;       transmitted via e-mail; or  
 hand-delivered;

to: Shaun Mullins  
Gerri Kavanaugh  
Oklahoma Dept. of Securities  
120 N. Robinson, Suite 860  
Oklahoma City, OK 73102

  
Kenneth M. Smith