

IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT  
OKLAHOMA COUNTY, OKLA.

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

APR 29 2003

Plaintiff, )

PATRICIA PRESLEY, COURT CLERK  
by \_\_\_\_\_  
Deputy

v. )

Case No. CJ-2003-3174-62

B&B WORM FARM, an unincorporated )  
entity, B&B WORM FARMS, INC., a )  
Nevada Corporation, LYNN BRADLEY, )  
an individual, and the ESTATE OF )  
GREGORY MILES BRADLEY, a )  
deceased individual, )

Defendants. )

**OBJECTION OF LYNN BRADLEY TO APPLICATION FOR  
TEMPORARY RESTRAINING ORDER AND ORDER FREEZING ASSETS**

Defendant Lynn Bradley ("Bradley") respectfully objects to the application of the Oklahoma Department of Securities ("ODS") for a temporary restraining order and order freezing assets. This Court entered a Temporary Restraining Order and Order Freezing Assets on April 17, 2003.

1. Bradley objects to the application of the plaintiff, Oklahoma Department of Securities ("ODS"), for the temporary restraining order because the application is statutorily infirm and is not supported by sufficient evidence. Bradley requests that the temporary restraining order be dissolved. The temporary restraining order prohibits Bradley from transferring or otherwise

dissipating any of her assets, including any bank accounts over which she has signatory or other designated authority.

2. The ODS application for a temporary restraining is insufficient under Okla. Stat. Ann. tit. 12, § 1384.1 because it is not supported by specific facts shown by affidavit or by the verified petition that immediate and irreparable injury, loss, or damage will result to the ODS.

3. The ODS is not likely to prevail on the merits of its verified petition because it will not be able to prove that Bradley engaged in the acts alleged in the four causes of action stated in the petition for permanent injunction.

4. The ODS has an adequate remedy at law because it may obtain a judgment for money damages against Bradley if the ODS prevails on the merits of its verified petition.

5. The harm to Bradley from the temporary restraining order outweighs the benefit to the ODS because Bradley has been left destitute by the freeze on all of her personal assets, and therefore the temporary restraining order should be dissolved.

6. This Objection is supported by the accompanying brief.

Dated: April 29, 2003

Respectfully submitted,



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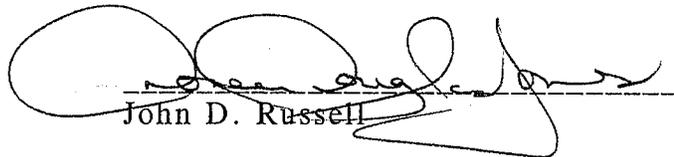
## CERTIFICATE OF SERVICE

I hereby certify that on this the 29<sup>th</sup> day of April, 2003, a full, true, and correct copy of the above and foregoing instrument, "**OBJECTION OF LYNN BRADLEY TO APPLICATION FOR TEMPORARY RESTRAINING ORDER AND ORDER FREEZING ASSETS**" was sent by facsimile and by depositing same in the United States mail, with proper first-class postage there, to the following counsel of record at the following address:

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