

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED

FEB 28 2003

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA: TULSA COUNTY

OKLAHOMA DEPARTMENT OF)
SECURITIES, ex rel. Irving L. Faught,)
Administrator,)

Plaintiff,)

vs.)

Case No. CJ-2001-188
Judge Sharron M. Bubenik

PARAKLETOS PROFESSIONAL)
SERVICES, L.L.C., an Oklahoma)
limited liability company, PARAKLETOS)
INVESTMENT CLUB, PARAKLETOS)
INVESTMENT CLUB II, CHARLES R.)
CHUNG, an individual, and J. ELAINE)
CHUNG, an individual,)

Defendants.)

**MOTION OF DEFENDANTS
CHARLES R. CHUNG AND J. ELAINE CHUNG
TO RESCHEDULE HEARING ON RESTITUTION**

COME NOW Charles R. Chung and J. Elaine Chung, being the individually-named defendants in this matter (the "Individual Defendants"), acting by and through their counsel, respectfully request a rescheduling of the hearing set herein for March 24, 2003, at 8:45 a.m. This request for a rescheduling of the hearing on restitution is based upon the facts as hereinafter set forth. Counsel for the Individual Defendants has contacted Rebecca Cryer, counsel for Plaintiff, who objects to this request for a continuance.

The hearing being requested to be rescheduled was originally scheduled for February 25, 2003. However, at the request of the Receiver, who was going to be out of town on that date, the hearing was rescheduled for March 24, 2003.

The Individual Defendants' sole business and source of earnings is the preparation of federal and state income tax returns for their clients. They service clients in a number of different states. Because of this, they are required to travel extensively during the months of February, March and the first half of the month of April. A schedule of this year's travel itinerary is appended as Exhibit "A" to this motion. It is during this timeframe that the greatest portion of the earnings of the Individual Defendants are realized.

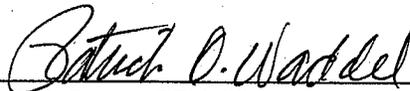
At present, the scheduled hearing date of March 24 is approximately three weeks before the deadline for filing of federal and state tax returns which are not otherwise extended. To require the Individual Defendants to attend a hearing scheduled on March 24 or on a date prior to April 15, 2003, would create a great imposition and hardship upon them personally and would be detrimental to their relationship with their clients.

Counsel for the Individual Defendants has been informed by the Receiver that his final accounting has not yet been concluded. A hearing on a final order of restitution would require that the final accounting data compiled by the Receiver be made available to the Court for consideration of such an order.

WHEREFORE, the Individual Defendants respectfully request the hearing on finalizing the order of restitution be rescheduled after April 15, 2003, at a date that is convenient for the Court.

Respectfully submitted,

SNEED LANG, P.C.

By: 

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**ATTORNEYS FOR DEFENDANTS,
CHARLES R. CHUNG and
J. ELAINE CHUNG**

CERTIFICATE OF MAILING

I hereby certify that on this, the 28th day of February, 2003, I caused to be deposited in the United States Mail, with proper postage thereon affixed, a true and exact copy of the above and foregoing to:

Rebecca A. Cryer, Esq.
Oklahoma Department of Securities
First National Center, Suite 860
120 North Robinson
Oklahoma City, Oklahoma 73102

Neal Tomlins, Esq.
Tomlins & Goins
2100 South Utica Avenue, Suite 300
Tulsa, Oklahoma 74114



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February - April 2003 Tax Schedule

Location	Dates and Days	Coordinator	Tax prep Place	Address	Phone and Fax
Albuquerque, NM	March 10 Mon	Betty Wimpy (505) 286-2183	Walmart Motorhome	301 San Mateo Blvd SE Albuquerque, NM 87108	(918) 521-8761
Austin, TX	Feb. 21 Fri	Jamie McKenzie (512) 327-3845	David & Jamie's Home	7901 Bee Caves Rd. #5 Austin, TX 78746	(512) 327-3845 (512) 328-7342
Colorado Springs, CO	Feb. 7-9 Fri-Sun	Velma Adamson (719) 635-3746	Velma's House	1263 E. Madison, Colo Springs, CO 80907	(719) 635-3746
Dallas/Ft. Worth, TX	Feb. 22-23, Mar. 31-Apr. 2, 9-12	Margret Mahand (972) 255-2005	AmeriSuites Hotel	4235 W. Airport Rd. Irving, TX 75062	(972) 659-1272 (972) 570-0676
Daytona Beach & Port Orange, FL	Feb. 14-15 Fri-Sat	Ray Dubois (386) 788-3966	Family Worship Center	4425 S. Ridgewood Port Orange, FL 32127	(904) 788-3966 (904) 756-6250
Denver, CO	March 6 Thu	Rita Channell (303) 794-8251	Rita Channell's Home	5037 Keenland Ct. Englewood, CO 80110	(918) 521-8761
El Paso, TX	April 8 Tue	Rachael Chung (918) 688-0727	Red Roof Inn in Motorhome	11400 Chito Sananiego El Paso, TX 79936	(915) 599-8877 (915) 5992726
Ft. Walton, FL	Feb. 11 Tue	Don Wirt (850) 936-5421	Walmart Motorhome	On Beal Parkway in Ft. Walton	(918) 521-8761
Grove, OK	March 27 Thu	Janice Wakeland (918) 786-6504	Walmart Motorhome	On Main Street in Grove Behind 6IT-N-60	(918) 521-8761
Houston, TX	Feb. 20 Thu	Rachael Chung (918) 688-0727	Walmart near Spencer Rd	7080 Hwy 6 North 2 miles S of Hwy 290	(918) 521-8761 (281) 855-1604
Jackson, MI	March 21-23 Fri-Sun	Charity Hills (517) 782-1446	Bethel Family Worship Center	1056 Bryant St Jackson, MI 49202	(517) 782-1446 (517) 782-1237
Jacksonville, FL	Feb. 16 Sun	Ed Dabbert (904) 282-0285	Parent's Home Motorhome	3420 Chimney Drive Middleburg, FL 32068	(918) 521-8761
Joplin, MO	March 26 Wed	Rachael Chung (918) 688-0727	Sam's Club Motorhome	I44 & Rangeline N to Olive Garden	(918) 521-8761
Livingston, TX	Feb. 18-19 Tue-Wed	Alice Moya (409) 327-4850	Living Word Church	201 Pan America Dr. Livingston, TX 77351	(936) 327-7466 (936) 327-4862
Marshall, TX	Feb. 9-10 Sun-Mon	Arlene Arlington (903) 935-7215	Ramada Inn & Motorhome	5301 East End Blvd. Marshall, TX 75672	(903) 927-0009 (903) 927-0016
Merrillville, IN	March 19-20 Wed-Thu	Chrisann Rogers (219) 938-5960	Fairfield Inn & Motorhome	8275 Georgia St Merrillville, IN 46410	(219) 736-0800 (219) 736-5116
Oklahoma City, OK	March 11-13 Tue-Thu	Jan Wilson (405) 634-6909	Lexington Hotel & Motorhome	1200 S. Meridian Okla. City, OK 73108	(405) 943-7800 (405) 943-8346
Parsons, KS	Feb. 27- Mar 3 Thu-Mon	Marti Warren (620) 336-3676	Super 8 Motel Meeting Room	229 E. Main Parsons, KS 67357	(620) 421-8000 (620) 421-8228
Reeves, LA	Feb. 17 Mon	Patsy Cavenah (337) 666-2678	Motorhome at The Lighthouse	180 Lighthouse Lane Reeves, LA 70658	(337) 666-2678 (337) 666-2678
Silver City, NM	April 3 Thu	Rachael Chung (918) 688-0727	Walmart Motorhome	2501 Highway 180 E. Silver City, NM 88061	(918) 521-8761
Springfield, MO	March 17-18 Mon-Tue	Jeff Gorman (417) 865-1468	Hampton Inn Sa & Motorhome	3232 S. Glenstone Springfield MO 65804	(417) 882-6611 (417) 882-0422
Tampa, FL	Feb. 12-13 Wed-Thu	Doug Wingate (813) 920-5984	Quality Inn & Motorhome	400 E. Bearss Ave. Tampa FL 33613	(813) 961-1000 (813) 961-5704
Tipton, IN	March 24-25 Mon-Tue	Naunie Reeves (765) 963-5810	East Inn & Motorhome	127 E. Main Tipton IN 46072	(765) 675-7505 (765) 675-7152
Topeka, KS	March 4-5 Tue-Wed	Sherry Fitzgerald (785) 234-5187	Holiday Inn Hollidome	605 Fairlawn Rd. Topeka KS 66604	(785) 272-8040 (785) 272-8065
Tucson, AR	April 4-7 Thu-Sun	Tina Tuskey (520) 751-4325	Roadway Inn & Motorhome	810 E. Benson Hwy Tucson AZ 85701	(520) 884-5800 (520) 624-2681
Tulsa, OK	2/1-6, 24-26; 3/14- 16, 28-30; 4/13-15	Rachael Chung (918) 688-0727	Home office (81 st St & 145 th E Ave)	1201 S. Redbud Ave. Broken Arrow 74012	(918) 259-2997 (918) 259-2987
Tyler, TX	Feb. 7-8 Fri-Sat	Gloria Hunt (903) 526-2876	La Quinta Inn & Motorhome	1601 W. SW. Loop 323 Tyler, TX 75701	(903) 561-2223

EXHIBIT A