

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, and)
DOUGLAS L. JACKSON, in his capacity as)
Court-appointed Receiver,)

NOV 10 2009

PATRICIA PRESLEY, COURT CLERK

by _____

DEPUTY

Plaintiffs,)

v.)

Case No. CJ-2009-10905

THE ESTATE OF BRYAN DAVID ROARK,)

*Jan 6 10:50
Cory (APP)*

Defendant.)

**APPLICATION BY RECEIVER FOR APPROVAL OF EMPLOYMENT OF
CONSULTANT RE: CATTLE, EQUIPMENT AND REAL ESTATE**

COMES NOW the Receiver, Douglas L. Jackson, by and through the undersigned counsel and makes application to the court for approval to employ a consultant to assist him in securing, managing and possibly selling cattle, farm equipment and machinery and real estate, and would show the court the following:

1. Douglas L. Jackson was appointed Receiver by Order of this Court entered in the above-entitled case on November 4, 2009 relative to the Assets as defined therein pertaining to the Estate of Bryan David Roark.

2. The Order appointing Mr. Jackson as Receiver contained a provision authorizing him to retain and employ attorneys, accountants, computer consultants, and other persons as he deems advisable in this and to the exercise of his duties as Receiver. See November 4, 2009 Order Freezing Assets and Appointing Receiver, at pg. 3, ¶5.

3. In reviewing preliminary records obtained and meeting with members of Decedent's immediate family, Receiver has learned that a substantial part of the Assets over which he has been appointed consist of cattle, farm equipment and machinery, and real property.

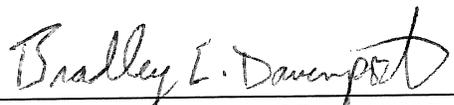
4. For the foregoing reason, Receiver requests authorization from the Court to employ A. L. Hutson as a consultant to advise and assist him in securing, managing and possibly liquidating the cattle, farm equipment and machinery, and real estate included in the Assets. Mr. Hutson served as Area Extension Ag Economics Specialist in Southwest Oklahoma from 1973 to 2003, and has maintained his own stocker-feeder cattle operation for many years. Mr. Hutson is well-qualified to consult with and advise the Receiver on agricultural and farm management issues. A copy of Mr. Hutson's C.V. is attached hereto as Exhibit "A".

5. Mr. Hutson charges a flat fee of \$100 per hour for his consulting work.

6. In the interest of full disclosure, the Receiver advises the court and all interested parties that Mr. Hutson is the brother-in-law of the Receiver. However, the Receiver is confident in the qualifications and integrity of Mr. Hutson. He can begin assisting the Receiver immediately and does not require a retainer.

WHEREFORE, the Receiver requests the Court approve his employment of A. L. Hutson of Duncan, Oklahoma, as consultant on cattle, farm equipment and machinery and real estate, which appear to constitute a significant part of the assets for which the Receiver has been appointed in this case, to advise and represent the Receiver relative to the agricultural and farm management matters presently pending or arising hereafter in the course of Receivership.

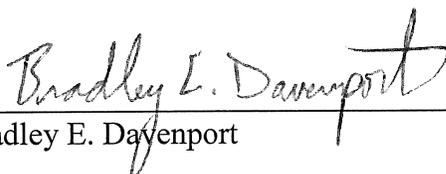
Respectfully submitted,


Bradley E. Davenport, OBA #18687
GUNGOLL, JACKSON, COLLINS, BOX & DEVOLL, P.C.
3030 Chase Tower
100 N. Broadway Avenue
Oklahoma City, OK 73102
Ph. (405) 272-4710 / Fax (405) 272-5141
Attorney for Receiver

CERTIFICATE OF SERVICE

I do hereby certify that on this 10th day of November, 2009, I mailed a true and correct copy of the above and foregoing document by placing same in the United States mails, postage prepaid, to:

Jennifer Shaw
Melanie Hall
Oklahoma Department of Securities
120 N. Robinson, Suite 860
Oklahoma City, OK 73102
Attorneys for Plaintiff



Bradley E. Davenport

**A.L. Hutson
5011 W. Elk
Duncan, OK 73533
580-255-2810**

Education:

B.S. Agriculture Economics, Oklahoma State University, 1971
M.S. Agriculture Economics, Oklahoma State University, 1973

Experience:

Currently Owner, operator of Stocker-Feeder Operation
Area Extension Ag Economics Specialist, 1973 to 2003, Retired
Wilson & Company, 1972-1973

Responsibilities:

Areas of emphasis while Area Extension Ag Economics Specialist included marketing and risk management; financial management and planning; farm and ranch record keeping; crop and livestock development and use; and estate planning. Evaluated feasibility of over 120 Chapter 12 reorganizations. Provided agriculture training to Federal Reserve and state bank examiners.

Publications:

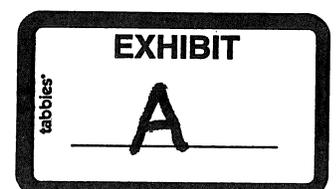
Managing the Cow-Calf Herd on Wheat Pasture: K. Apple, A. Hutson, K. Lusby

Evaluation of Wheat Forage In Wintering Programs for Cow-Calf Operations:
K. Apple, K. Lusby, A. Hutson & G. Provence

Stocker Wheat Availability Program: A. L. Hutson, Damona G. Doye, CR-192,
September 1987

SWAP: An Expanded Pasture Producer/Cattleman Referral System: A. L.
Hutson, Damona G. Doye, CR 207, July 1988

Cotton Provision of The Food Security Act of 1988: Larry Sanders and A. L. Hutson, CR
483, April 1986



Analysis of the 1986 Government Cotton Program: A. L. Hutson and Larry Sanders, CR 484,
April 1986

Basics of Live Cattle Options Trading: A. L. Hutson, Clement E. Ward, OSU Facts No. 487,
June 1986

Cash Settlement of Feeder Cattle Futures Contracts: A. L. Hutson and Kim Anderson, OSU
Facts No. 509, September 1989

Awards:

Outstanding Field Staff OCES-1987

O.S.U. Alumni Service Award-1990

Distinguished Service Award OCES -1996

Distinguished Service Award NACAA-1996

Farm & Ranch Management Program Award OCES- 1995