

5/7/09 at 1:30pm
J. Gurich

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF SECURITIES
EX REL. IRVING L. FAUGHT,
ADMINISTRATOR,

Plaintiff,

v.

GLOBAL WEST FUNDING, LTD., Co.,
AN OKLAHOMA LIMITED LIABILITY COMPANY;
GLOBAL WEST FINANCIAL LLC,
AN OKLAHOMA LIMITED LIABILITY COMPANY;
SURE LOCK FINANCIAL, LLC,
AN OKLAHOMA LIMITED LIABILITY COMPANY;
SURE LOCK LOANS LLC, AN OKLAHOMA
LIMITED LIABILITY COMPANY;
THE WAVE-GOLDMADE, LTD.,
AN UNINCORPORATED ASSOCIATION;
BRIAN MCKYE, AN INDIVIDUAL;
JOE DON JOHNSON, AN INDIVIDUAL; AND
JAMES FARNHAM, AN INDIVIDUAL,

Defendants,

AND

HERITAGE ESTATE SERVICE, LLC,
AN OKLAHOMA LIMITED LIABILITY COMPANY,

Relief Defendant.

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

APR - 8 2009

PATRICIA PRESLEY, COURT CLERK
by _____
DEPUTY

No. CJ-2009-2773
(Civil relief more than \$10,000:
INJUNCTION / RESTRAINING ORDER)

Filed: 03/24/2009

Judge: Gurich, Noma D.

APPLICATION FOR ATTORNEY FEES

Richard L. Rose of Mahaffey & Gore P.C., ("Rose") hereby requests that this Court and the duly appointed Special Master release to him his reasonable attorney fees and costs incurred thus far in representing Defendants, Brian McKye; Sure Lock Loans LLC; Sure Lock Financial, LLC; Global West Funding, Ltd., Co.; and Global West Financial LLC, in the above entitled action. In support of his application, Rose shows the Court as follows:

FACTUAL BACKGROUND

Rose has represented Brian McKye and some of Mr. McKye's businesses, to varying degrees, for the past couple of years. Recently, Mr. McKye called Mr. Rose and requested that he assist in the defense of the claims against McKye and his related entities. Mr. Rose agreed to do so, putting aside all other material projects, and began working on the defense and presentation for the April 1, 2009 hearing regarding unfreezing of the Defendants' assets. Due to the temporary restraining order which was in place at the time, McKye was unable to pay a retainer when Rose was retained. Rose is seeking payment of the current fees as well as a reasonable retainer to cover additional representation going forward.

ARGUMENT AND AUTHORITY

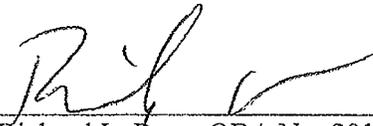
Fees for Labor and Services Rendered

This case is unique in that Rose is not seeking fees as a prevailing party, but instead is seeking permission for monies, originally frozen, and now controlled exclusively by the Special Master, to be paid as agreed between Defendants and counsel. Currently, Rose seeks \$8,595.00 in fees currently due for this case. The fee is derived from the number of hours worked 33.20, multiplied by the billing rate of Rose at \$225.00 per hour. Additionally, Rose requests a reasonable retainer to cover additional fees going forward, said fees to be placed in trust and withdrawn as earned and billed. The undersigned counsel has attached copies of the fee agreement and a breakdown of billable hours.

The requested total of \$8,595.00 is reasonable, both in terms of the number of hours spent, the applicable rates, and the amount of the costs and expenses charged.

WHEREFORE, Rose respectfully requests that he be paid his requested reasonable attorney fees and the requested reasonable retainer from Defendants' funds currently under the control of the Court Appointed Special Master.

Respectfully submitted,



Richard L. Rose, OBA No. 20105
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 Oklahoma City, OK 73104
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 Facsimile: (405) 236-1840
 Attorney for Brian McKye; James Farnham; Sure Lock Loans LLC; Sure Lock Financial, LLC; Global West Funding, Ltd., Co.; and Global West Financial LLC

CERTIFICATE OF SERVICE

This is to certify that on April 8, 2009 an accurate copy of the foregoing document was mailed, postage prepaid, to opposing counsel as follows:

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Richard L. Rose