IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.
MAR 27 2012
PATRICIA PRESLEY, COURT CLERK
by _____ DEPUTY

OKLAHOMA DEPARTMENT OF SECURITIES, *ex. rel.* Irving L. Faught, Administrator,	)	
Plaintiff,	)	Case No. CJ-2009-2773
vs.	)	
GLOBAL WEST FUNDING, LTD., CO., an Oklahoma limited liability company, et al.,	)	**HEARING SET FOR MAY 3, 2012 @ 2:30 P.M.**
Defendants.	)	

MOTION TO DISMISS AND TO DISCHARGE THE SPECIAL MASTER

Plaintiff, Oklahoma Department of Securities *ex rel.* Irving L. Faught, Administrator, moves this Court to dismiss this case and to dissolve the receivership for the following reasons:

1. On March 24, 2009, a *Petition for Permanent Injunction and Other Equitable Relief* (Petition) was filed against the Defendants Global West Funding, Ltd., Co., Global West Financial LLC, Sure Lock Financial, LLC, Sure Lock Loans LLC, The Wave-Goldmade Ltd., Brian McKye, Joe Don Johnson, and James Farnham. Heritage Estate Service LLC (Heritage) was named as a Relief Defendant.

2. On April 1, 2009, an *Agreed Order Appointing Special Master* was entered by this Court. Stephen J. Moriarty was appointed Special Master over Defendants Global West Funding, Ltd., Co., Global West Financial LLC, Sure Lock Financial, LLC, Sure Lock Loans, LLC, The Wave-Goldmade, Ltd., and Brian McKye.

3. On April 10, 2009, Plaintiff amended the Petition to include Heritage as a Defendant.

4. On April 23, 2009, Stephen J. Moriarty was appointed Special Master over Heritage.

5. On May 19, 2011, the Special Master filed an application to establish a claims procedure.

6. On June 22, 2011, the *Order Granting Application of Special Master, Stephen J. Moriarty to Establish Procedure to Notify Claimants to Make Claims* was entered by this Court.

7. On October 17, 2011, the *Final Application of Special Master, Stephen J. Moriarty for Compensation and Reimbursement of Expenses* was filed with the Court.

8. On October 21, 2011, the *Order Granting Special Master's Motion for Distribution* was entered by this Court. Pursuant to the Court's Order, the Receiver made distributions to the investors and other creditors.

9. On December 1, 2011, the *Order on Special Master's Final Application for Allowance and Payment of Compensation and Reimbursement of Expenses* was entered by this Court.

10. On December 9, 2011, the Oklahoma Supreme Court issued a mandate requiring this Court to take the action required by the Oklahoma Court of Civil Appeals September 27, 2011 ruling in Case No. 108,101. In connection with this ruling, the Special Master has attempted to contact Jeff Burke (Burke). Burke has not responded to the Special Master nor filed anything with this Court. Plaintiff requests that the Court

find that any claim held by Burke is deemed abandoned due to Burke's failure to appear or otherwise respond.

11. The actions taken by the Special Master in this matter were taken for the benefit of investors and other persons likely to have been injured by the activities of Defendants Global West Funding, Ltd., Co., Global West Financial LLC, Sure Lock Financial, LLC, Sure Lock Loans LLC, The Wave-Goldmade Ltd., Brian McKye, and Heritage and are in accordance with the purposes for which the Special Master was appointed.

12. The Special Master has liquidated assets of the Defendants and accounted to this Court for all payments made from the liquidation of such assets.

13. The Special Master has taken reasonable actions necessary to settle all outstanding claims against the Defendants.

14. The need for continued oversight by the Special Master is now at an end.

WHEREFORE, Plaintiff requests that this Court enter an order dismissing the case; dissolving the special master appointment; and discharging Stephen J. Moriarty, as Special Master, and releasing him from any further duties.

Respectfully submitted,

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CERTIFICATE OF MAILING

The undersigned certifies that on the 27 day of March, 2012, a true and correct copy of the foregoing was mailed via First Class Mail, postage prepaid, to the following:

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