

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

NOV 21 2013

TIM RHODES
COURT CLERK

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

Plaintiff,)

v.)

Case No. CJ-2009-7957
Judge: Davis, Lisa T.

STORYBOOK PROPERTIES, LLC,)
a California limited liability company;)
STORYBOOK INVESTMENTS WA,)
LLC, a Washington limited liability)
company; MATTHEW G. STORY)
an individual; JOE DON JOHNSON,)
an individual; and JAMES FARNHAM,)
an individual,)

Defendants.)

MOTION TO DISSOLVE RECEIVERSHIP

COMES NOW Stephen J. Moriarty, the Court appointed Receiver for Storybook Properties, LLC, Storybook Investments WA, LLC, EZ-To-Buy Homes, LP and Matthew G. Story (collectively the "Storybook Companies"), and for his Motion to Dissolve Receivership for the Storybook Companies (the "Motion") states as follows:

3. On October 7, 2009, this Court entered its order appointing the Receiver (the "Order"). Pursuant to the Order, Receiver was given "immediate custody and control of all assets located in the State of Oklahoma belonging to the Storybook Defendants...."

4. On November 22, 2010, Receiver filed a Motion to Approve Proposed Distribution to Investors (the "Distribution Motion").

5. On January 24, 2011 the Court entered an Order granting the Distribution Motion, subject to the right of any investor to object to the proposed distribution (the “Distribution Order”).

6. On January 28, 2011, Mr. and Mrs. Albert Hawkes timely filed an objection to the Distribution Order (the “Hawkes Objection”).

7. On May 12, 2011, Receiver filed an Amended Motion for Proposed Distribution (the “Amended Distribution Motion”).

8. On June 2, 2011, the Court entered an Order overruling the Hawkes Objection and granting the Amended Distribution Motion (the “Amended Distribution Order”). Pursuant to the Amended Distribution Order, Receiver made a distribution of \$370,000.00 to the investors of the Storybook Companies.

9. Receiver has now liquidated all of the known assets of the Storybook Companies and is in a position to make a final distribution to the Storybook investors. The Receiver holds \$54,256.54. Receiver has incurred fees and expenses since September 30, 2011 in the amount of \$10,802.34. There will be additional fees and expenses associated with winding up the Receivership and making the final distribution to the Storybook investors. Receiver believes a distribution of \$40,000.00 can be made to the Storybook investors.

10. Receiver proposes the remaining funds be used as follows: (a) payment of Receiver fees and expenses for the period from and after September 30, 2011 in the amount of \$14,256.54, (b) a final distribution to of \$40,000.00 to the Storybook investors, pro rata, according to the percentages established in the Amended Distribution Order, and (c) payment to the Oklahoma Department of Securities Investor Education Revolving Fund of the proceeds of any checks mailed to Storybook investors pursuant to this paragraph that are not negotiated

within 60 days from the date they are mailed. Upon approval of these payments, Receiver will have completed his work and all assets will have been fully distributed.

11. The actions taken by the Receiver in this matter were taken for the benefit of investors and other persons likely to have been injured by the activities of the Storybook Companies and are in accordance with the purposes for which the Receiver was appointed.

12. The Receiver has liquidated all known assets of the Storybook Companies and accounted to this Court for all payments made from the liquidation of such assets.

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

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

WHEREFORE, Receiver, Stephen J. Moriarty requests that this Court enter an order (a) approving the payment of the remaining funds on the terms set forth herein, (b) dissolving the receivership; and (c) discharging Stephen J. Moriarty, as Receiver, and releasing him from any further duties.



Stephen J. Moriarty, OBA # 6410
FELLERS, SNIDER, BLANKENSHIP,
BAILEY & TIPPENS, P.C.
100 North Broadway, Suite 1700
Oklahoma City, OK 73102
Telephone: (405) 232-0621
Fax: (405) 232-9659
E-mail: smoriarty@fellerssnider.com

RECEIVER FOR THE STORYBOOK
COMPANIES

NOTICE OF HEARING

Please be advised that a hearing on Receiver's Motion to Dissolve Receivership will be heard at 1:30 p.m. on the 9th day of January, 2014 before the Honorable Lisa T. Davis, District Judge.

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the Motion for Proposed Distribution of Receiver, Stephen J. Moriarty was mailed on this 21st day of November, 2013, by placing the same in the United States mails, postage prepaid, to:

Patricia A. Labarthe, Esq.
Jennifer Shaw, Esq.
Oklahoma Department of Securities
First National Center, Suite 860
120 N. Robinson
Oklahoma City, OK 73102

Matthew G. Story
27943 Seco Canyon Rd., Suite 201
Santa Clarita, CA 91350

James Farnham
6308 N. Harvard Ave.
Oklahoma City, OK 73122



Stephen J. Moriarty