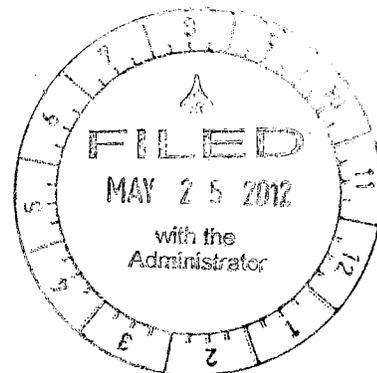


STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
THE FIRST NATIONAL CENTER
120 NORTH ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of: Geary Securities, Inc., fka Capital West Securities, Inc.;
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondent.

ODS File No. 09-141

MOTION OF RESPONDENT, NORMAN FRAGER, TO CONTINUE HEARING

COMES NOW the Respondent, Norman Frager ("Frager"), and respectfully asks that the hearing scheduled herein for June 18, 2012, be continued sixty (60) days. In support hereof, Frager would show as follows:

1. On May 17, 2012, the Hearing Officer entered the Final Amended Scheduling Order (the "Order") in this matter.
2. Amongst other deadlines contained in the Order, the hearing for this proceeding was set for Monday, June 18, 2012.
3. As the Hearing Officer is aware, Frager has recently obtained recordings of telephone conversations between the Oklahoma Department of Securities (the "Department") and Pershing, LLC ("Pershing"). These recordings contain information which undercuts the basis for the Department's claims.
4. Given recent comments made by the Hearing Officer, as well as the fact that the Department has now disclosed that it wishes to present an unnamed representative of Pershing at the hearing, Frager has determined that it is necessary to depose all parties who were present at the time the conversations occurred between the Department and Pershing so that he may more fully explore the issues related thereto.

5. To this end, Frager is issuing deposition subpoenas to counsel for the Department, Melanie Hall and Terra Bonnell, as well as to the Departments' Director of Licensing and Examinations, Carol Gruis.

6. It is anticipated that the Department will object to these subpoenas and that further briefing will be required to explore these issues.

7. Additionally, the Department has not disclosed the identity of the witness it intends to call from Pershing. Until such identification is made, Frager will not have an opportunity to depose such a person and it is vital that Frager have an opportunity to do so prior to the hearing in this matter.

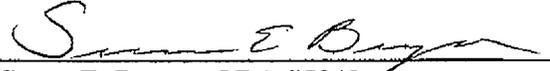
8. Finally, Frager has also recently become aware that the documents produced by the Department pursuant to discovery issued herein are incomplete. Until such documents are fully produced, Frager cannot determine if he may need additional discovery, including additional depositions, to fully prepare his case.

9. Given the short amount of time remaining prior to the hearing, and given the fact that there are already several depositions scheduled across the country in the remaining few weeks, it will be difficult, if not impossible, to resolve all of these issues prior to the date of the hearing.

10. Accordingly, Frager would ask that the date for the hearing be continued at least sixty (60) days to allow for the full and complete resolution of all of these issues.

WHEREFORE, Frager prays that the Hearing Officer grant this request and continue this matter at least sixty (60) days to allow for the full and complete resolution of these issues.

Respectfully Submitted,



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Attorneys for Respondent Norman Frager

CERTIFICATE OF SERVICE

I hereby certify that on May 25, 2012, a copy of the foregoing document was served on the following via electronic mail:

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