

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. *aka* Capital West Securities, Inc.;
Keith D. Geary; Norman Frager; and CEMP, LLC,

Respondents.

ODS File No. 09-141

RESPONDENTS' JOINT REQUEST FOR HEARING ON PENDING MOTIONS

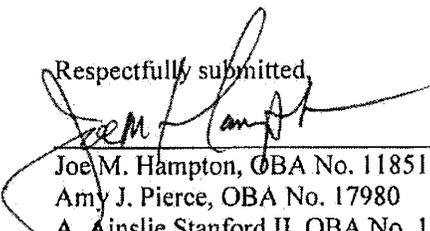
Respondents, Keith D. Geary, Geary Securities, Inc. (formerly known as Capital West Securities, Inc.), CEMP, LLC (the "Geary Respondents") and Norman Frager (collectively referred to as the "Respondents"), respectfully submit this Joint Request for Hearing and ask that the Hearing Officer schedule a hearing on the following pending motions that are now at issue:

DATE FILED	FILED BY	AT ISSUE?	MOTION
11-1-11	ODS	Yes ¹	Motion for Summary Decision Against Frager
11-9-11	Geary	Yes	Motion for Preclusion Order (Bank of Union Directors and Exhibit)
11-14-11	Geary	Yes	Motion for Preclusion Order (Headington)
12-21-11	Geary	Yes	Motion to Bifurcate and Stay Net Capital Claims
12-23-11	Frager	Yes	Motion to Bifurcate and Stay Proceedings Predicated on Federal Claims
12-23-11	ODS	No	Motion for Partial Summary Decision Against Geary Respondents
12-28-11	Frager	Yes ²	Motion for Sanctions

¹ The Department's Motion for Summary Decision Against Frager is directed solely to the Net Capital Claims, which are the subject of Respondents' Motions to Bifurcate and Stay (filed December 21 and 23, 2011). If granted, the Motions to Bifurcate and Stay would eliminate the need to address the Department's Motion for Summary Decision.

² The Department asserts, that Rule 2011 (C)(1)(a) of the Oklahoma Rules of Civil Procedure applies. That Rule gives the Department the right to avoid the sanctions by withdrawing the offending Motion (the Motion for Summary Decision against Frager) within 21 days from December 28, 2011, the date on which the Department was served with the Motion for Sanctions. If the Department withdraws the Motion for Summary Decision, both that Motion and the Motion for Sanctions would no longer be at issue. Otherwise, the Motion for Sanctions can be heard by the hearing officer any time after January 18, 2012.

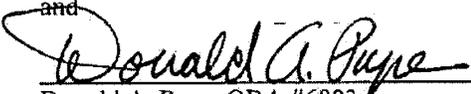
Respectfully submitted,


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**ATTORNEYS FOR NORMAN
FRAGER**

CERTIFICATE OF SERVICE

I hereby certify that on January 10th, 2012, a copy of the foregoing document was served on the following by e-mail:

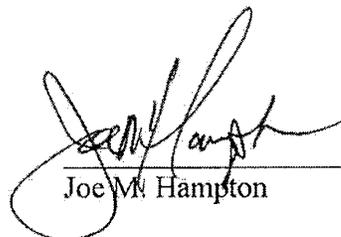
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