

IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF)
SECURITIES ex rel. Irving L. Faught,)
Administrator,)

Plaintiff,)

v.)

Case No. CJ-2001-00188-Bubenik

PARAKLETOS PROFESSIONAL)
SERVICES, L.L.C., an Oklahoma)
limited liability company; PARAKLETOS)
INVESTMENT CLUB; PARAKLETOS)
INVESTMENT CLUB II; CHARLES R.)
CHUNG, an individual; and)
J. ELAINE CHUNG, an individual,)

Defendants.)

**APPLICATION FOR HEARING ON
MOTION FOR (i) APPROVAL OF DETERMINATION OF CLAIMS FOR PURPOSES OF
DISTRIBUTIONS TO INVESTORS; (ii) AWARD OF
COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT
OF EXPENSES INCURRED; AND (iii) DISCHARGE OF RECEIVER**

Neal Tomlins, Esq., the duly-appointed Receiver for Parakletos Investment Club and Parakletos Investment Club II, respectfully requests that the Court set a hearing on the "Motion for (i) Approval of Determination of Claims for Purposes of Distributions to Investors; (ii) Award of Compensation for Services Rendered and Reimbursement of Expenses Incurred; and (iii) Discharge of Receiver" (the "Motion"). This Court has previously set a hearing on restitution for 10:00 a.m. on July 16, 2003 and in an effort to preserve judicial resources, Receiver requests that this Motion be heard at the same time.

WHEREFORE, Receiver respectfully requests that the Court set a hearing on the Motion on July 16, 2003 at 10:00 a.m. and for such other and further relief as this Court deems just and equitable.

Respectfully submitted,



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Receiver and Attorneys for Receiver

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June, 2003 a true and correct copy of the above and foregoing was forwarded by U.S. Mail, with proper postage thereon fully prepaid, to the following:

Rebecca A. Cryer
Oklahoma Department of Securities
120 North Robinson, Suite 860
Oklahoma City, OK 73102

Patrick Waddell
Sneed Lang
2 W. 2nd St., Suite 2300
Tulsa, OK 74103



Neal Tomlins