

IN THE DISTRICT COURT OF OKLAHOMA COUNTY

STATE OF OKLAHOMA

FILED IN THE DISTRICT COURT
OKLAHOMA COUNTY, OKLA.

MAR 19 1998

PATRICIA PHESLEY, COURT CLERK
By Deputy

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

Plaintiff,)

vs.)

Case No. CJ-98-373-62

RANDALL D. JEFFERS and)
RENAISSANCE U.S.A., INC.,)

Defendants.)

**JOINT APPLICATION FOR CONTINUATION OF HEARING
AND APPLICATION FOR EXTENSION OF ANSWER AND RESPONSE DATES**

The Defendant, Renaissance U.S.A., Inc. ("Renaissance"), and Plaintiff, Oklahoma Department of Securities ("Department"), respectfully request this Court continue the hearing on Plaintiff's Temporary Restraining Order and Preliminary Injunction for one (1) month, or until May 1, 1998. Renaissance and the Department further request this Court to grant Renaissance an extension of one (1) month, or until April 17, 1998, to file an answer or response to the Department's Petition for Permanent Injunction and Other Equitable Relief and file its response to the Department's Combined Motion for Temporary Restraining Order and Temporary Injunction and Brief in Support; the Department will file its reply on or before April 24, 1998. In support of this Application, the parties assert:

1. Renaissance and the Department had earlier filed three (3) Joint Applications for Continuance of Hearing on January 23, 1998, February 2, 1998, and March 5, 1998. Said Joint Applications were granted by the Court. The hearing on Plaintiff's Temporary Restraining Order and Temporary Injunction is currently scheduled for April 3, 1998.

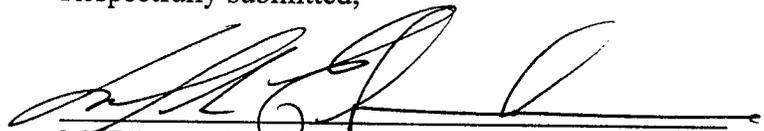
2. Renaissance and the Department have met and have agreed to this additional continuance and request for an extension in an effort to resolve the issue presented without expending judicial resources involved in a hearing on this matter.

3. Renaissance and the Department have had several meetings and discussions in an attempt to negotiate a resolution of this matter. Therefore, it is in the interest of justice and judicial expediency that the hearing and the deadlines for answering and responding be continued so that Renaissance and the Department can continue negotiations to attempt to resolve this matter.

4. Renaissance and the Department have agreed that the Temporary Restraining Order entered on January 16, 1998, by the Court should remain in effect until the hearing is conducted by the Court or the matter is resolved.

WHEREFORE, for the reasons set forth above, the Department and Renaissance respectfully request this Court enter its order continuing the hearing on Plaintiff's Motion for Temporary Restraining Order and Temporary Injunction to May 1, 1998, extending Renaissance's answer and response date to the Department's Petition for Permanent Injunction and Other Equitable Relief to April 17, 1998, and extending Renaissance's response date to the Department's Combined Motion for Temporary Restraining Order and Temporary Injunction and Brief in Support to April 17, 1998, and the Department will file a reply on or before April 24, 1998.

Respectfully submitted,



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