

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

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 APPOINTMENT**  
**OF ATTORNEYS FOR RECEIVER**  
(Tomlins & Goins)

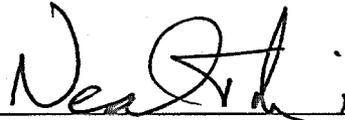
The duly appointed Receiver in this case, Neal Tomlins, Esq., respectfully submits this Application for the appointment of the law firm of Tomlins & Goins, a Professional Corporation, as attorneys for the Receiver in this case and alleges and states as follows:

1. The Receiver was appointed by Order dated January 11, 2001. The Court approved the Receiver's Bond on January 22, 2001.
2. The Receiver makes this application for the appointment of the law firm of Tomlins & Goins to serve as Receiver's attorneys in the above-captioned case.
3. The law firm of Tomlins & Goins consists of licensed attorneys who (i) do not hold or represent an interest adverse to the estate, (ii) are disinterested persons, and (iii) do not, in connection with this case, represent a party. The Receiver is a member of the law firm of Tomlins & Goins.

4. The Receiver requests that the law firm of Tomlins & Goins be authorized to act as attorneys for the Receiver in the above-captioned case. The Receiver desires legal counsel to represent him in this case and other members of Tomlins & Goins will be utilized to represent the Receiver and to assist him in the performance of his duties.

WHEREFORE, the Receiver prays that this Court enter an Order authorizing the Receiver to employ the law firm of Tomlins & Goins to serve as attorneys in the above-captioned case and to be compensated on a general hourly basis.

Respectfully submitted,



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Neal Tomlins, OBA No. 10499  
TOMLINS & GOINS  
A Professional Corporation  
Utica Plaza Building  
2100 South Utica Avenue, Suite 300  
Tulsa, Oklahoma 74114  
(918) 747-6500

Receiver

CERTIFICATE OF MAILING

I hereby certify that on the 4<sup>th</sup> day of April, 2001, 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 Cryer, Esq.  
Oklahoma Department of Securities  
120 North Robinson, Suite 860  
Oklahoma City, OK 73102

Donald M. Bingham, Esq.  
Stephen E. Hale, Esq.  
Riggs, Abney, Neal, Turpen,  
Orbison & Lewis  
502 West Sixth Street  
Tulsa, OK 74119-1010

  
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Neal Tomlins