

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FEB 12 2026

RICK WARREN
COURT CLERK

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OKLAHOMA DEPARTMENT OF
SECURITIES *ex rel.* MELANIE HALL,
ADMINISTRATOR,

Plaintiff,

v.

COOL BLUE CAPITAL LLC, an
Oklahoma limited liability company; COOL
BLUE CAPITAL MANAGEMENT LLC,
an Oklahoma limited liability company;
CHARLES BRENT ORR, individually; and
RYAN W. SHAY, individually,

Defendants.

Case No. CJ-2025-2051
Honorable Don Andrews

**JOINT MOTION FOR LEAVE TO SUBMIT
A PRELIMINARY PRE-TRIAL CONFERENCE ORDER**

Defendants, Cool Blue Capital, LLC (“CBC”), Cool Blue Capital Management, LLC (“CBCM”), Charles Brent Orr (“Orr”), and Ryan W. Shay (“Shay”) (collectively, “Defendants”), together with Plaintiff, Oklahoma Department of Securities *ex rel.* Melanie Hall, Administrator (the “Plaintiff” and together with Defendants, the “Parties”) jointly move for leave to submit a preliminary, abbreviated Pre-Trial Conference Order at the upcoming Pre-Trial Conference in the above-captioned matter set for April 8, 2026, and to set a future date for the submission of a final Pre-Trial Conference Order in advance of the scheduled trial date. In support of this Motion, the Parties respectfully state as follows:

1. On August 7, 2025, the Court entered a Scheduling Order setting the Pre-Trial Conference for May 13, 2026. On August 12, 2025, the Court entered an Amended Scheduling Order resetting the Pre-Trial Conference date to April 8, 2026.

2. Discovery is ongoing in this matter, and disputes regarding document production

and depositions are before the Court for resolution after good faith attempts to confer and resolve these disputes have failed and remain unresolved. Both Parties intend to depose various witnesses. However, these depositions will first require resolution of the discovery disputes detailed below to avoid the need to depose witnesses more than once.

3. On January 14, 2026, the Parties appeared by and through counsel for hearing on Plaintiff's Motion to Compel Discovery from Defendants ("Plaintiff's Motion to Compel"), filed herein on November 21, 2025. In relevant part, the Court ordered Plaintiff to reduce the number of her initial discovery requests to sixty (60) interrogatories and sixty (60) requests for productions for all four Defendants. The Court provided Defendants with thirty (30) days to respond to the revised requests. To date, a Journal Entry on Plaintiff's Motion to Compel has not been filed, and Defendants are still within the period of time to respond to these revised requests.

4. Additionally, Defendants filed their Motion to Compel Discovery on December 22, 2025. On January 27, 2026, the Court entered an Order setting Defendants' Motion to Compel Discovery for hearing on March 19, 2026.. The proximity of the March 19, 2026, hearing to the April 8, 2026, setting will not permit sufficient time for Defendants to conduct these depositions assuming the Court grants some or all of the relief Defendants have requested.

5. Defendants have also sought to take the deposition of the Plaintiff and her counsel in this matter. After conferring on this issue, Plaintiff has advised it intends to seek a protective order on these depositions and/or quash them. This issue will not be resolved before the April 8, 2026 pretrial conference.

6. Counsel for Defendants advised the Court of the potential need to continue the Pre-Trial Conference currently set for April 8, 2026, at the hearing on Plaintiff's Motion to Compel. The Court indicated it preferred to keep the Pre-Trial Conference date set for April 8, 2026, to

ensure a trial date in this matter in 2026. The Court further indicated that it would consider additional discovery after the Pre-Trial Conference if the Parties needed the same.

7. The Parties have conferred on the foregoing issues and believe they will need additional time beyond the April 8, 2026, Pre-Trial Conference date to conduct and complete discovery in this matter. The anticipated extension of some discovery past the Pre-Trial Conference date makes the submission of a full and final Pre-Trial Conference Order on April 8, 2026, premature. Any such Pre-Trial Conference Order would not include the information obtained in any discovery occurring past April 8, 2026.

8. Accordingly, the Parties request leave to submit a preliminary, abbreviated Pre-Trial Conference Order in advance of the April 8, 2026, setting for the reasons set forth above. The preliminary Pre-Trial conference Order would include appearances; a general statement of facts; the Parties' current contentions, claims for relief and anticipated defenses; the Parties' preliminary witness lists; the Parties' preliminary exhibit lists; and confirmation on the Parties' positions regarding trial briefs, estimated trial time, and settlement status. The preliminary Pre-Trial Conference Order would reserve final witness and exhibit lists, stipulations, and objections to witnesses and exhibits for a final Pre-Trial Conference Order for submission at a future date following resolution of discovery and in advance of the trial date.

9. At the April 8, 2026, setting, the Parties respectfully request that the Court set a new Pre-Trial Conference date and a trial date. Setting a new Pre-Trial Conference date will automatically extend and reset all other deadlines contained in the Amended Scheduling Order, including the dispositive motion deadline, expert disclosure deadlines, the deadline to submit final witness and exhibit lists, the deadline to complete mediation and the discovery cutoff. The Parties respectfully request that the Court extend all deadlines by no less than three (3) months. The

requested extension would set the final Pre-Trial Conference date on or after July 8, 2026.

CONCLUSION

WHEREFORE, the Parties respectfully request that the Court enter an Order granting them leave to submit a preliminary, abbreviated Pre-Trial Conference Order at the upcoming Pre-Trial Conference scheduled for April 8, 2026, and to set a future date for the submission of a final Pre-Trial Conference Order in advance of the scheduled trial date obtained at the April 8, 2026 setting. The Parties have submitted a proposed order contemporaneously herewith.

**HALL, ESTILL, HARDWICK, GABLE,
GOLDEN & NELSON, P.C.**

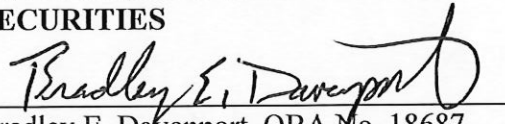


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