



DISTRICT COURT
FILED

OCT 02 2015

SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

y

[REDACTED]

PLAINTIFF/JUDGMENT
CREDITOR,

vs.

[REDACTED]

DEFENDANT/JUDGMENT
DEBTOR.

Case No. FD-2015-2204

Docket A

APPLICATION FOR ORDER TO DEFENDANT

TO APPEAR AND DISCLOSE PROPERTY

Plaintiff/Judgment Creditor, [REDACTED] ("Plaintiff" or "Creditor"), holder of the Judgment entered on January 26, 2015, and memorialized in a Judgment filed of record on January 28, 2015, in the Circuit Court of Garland County, State of Arkansas against Defendant/Judgment Debtor, [REDACTED] ("Defendant" or "Debtor") and subsequently registered as a Foreign Judgment in this Court pursuant to Okla. Stat. tit. 12, § 719 et seq., on August 18, 2015; requests that this Court enter an Order, pursuant to Okla. Stat. tit. 12, § 842, directing that the Debtor appear and answer concerning all assets. In support thereof, Plaintiff/Judgment Creditor shows this Court that there remains a balance due on said Judgment of NINETEEN THOUSAND SEVENTY NINE DOLLARS and 84/100 (\$19,079.84), plus post-judgment interest at the rate of ten percent (10%) per annum from January 28, 2015 for the Judgment, until the Judgment is paid in full; and that Plaintiff has been unable to collect said amounts from Debtor.


SALLY HOWE SMITH
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WHEREFORE, Plaintiff/Judgment Creditor, prays that the Court order [REDACTED] to appear before this Court or a referee duly appointed by this Court, at a time and place specified

in such Order, to answer questions concerning all assets and financial affairs and to further order the Debtor to produce and bring with him the documents set forth in Exhibit "A" attached hereto.

Dated: October 2nd, 2015.

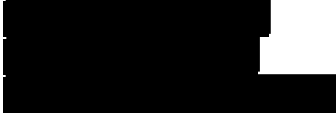
Respectfully submitted,



Heather Flynn Earnhart, OBA #19456
Kristen P. Evans, OBA #30210
320 South Boston Avenue, Suite 200
Tulsa, OK 74103-3708
Telephone (918) 594-0400
Facsimile (918) 594-0505
ATTORNEYS FOR PLAINTIFF,
[REDACTED]

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on this 2nd day of October, 2015, a true and correct copy of the above and foregoing instrument was served via private process server, on:



Kristen P. Evans
Kristen P. Evans

EXHIBIT "A"

1. Defendant/Judgment Debtor's federal and state tax returns for the last three years.
2. Legal descriptions of all real property in which Defendant/Judgment Debtor currently holds, or has held, any legal or equitable interest in the last three years, along with the names and addresses of all persons asserting any interest whatsoever in said real property, including, but not limited to liens, mortgages, ownership interest, or other encumbrances.
3. A list of all personal property in which Defendant/Judgment Debtor currently holds, or has held, any legal or equitable interest, including, but not limited to, all shares of stock owned by Defendant in the last three years, setting forth a description of the property, current location of such property, a list of all persons claiming any interest whatsoever in said personal property, including, but not limited to, liens, mortgages, leases, and encumbrances, and any financing statements, liens, mortgages, or leases covering said personal property.
4. A list of all bank accounts of Defendant/Judgment Debtor of any kind whatsoever, personal and business, during the last three years, including, but not limited to, checking accounts, savings accounts, and certificates of deposit, maintained in any bank, savings and loan or other type of financial institution, setting forth for each account, a description of the account, the account number, and the name and address of the institution in which such account is maintained.
5. Statements during the last three years for all bank accounts listed in response to No. 4 above.
6. A list of all stocks, bonds, and securities of any kind in which Defendant/Judgment Debtor has any legal or equitable interest, or had any legal or equitable interest in the last three years.
7. Statements during the last three years for all stocks, bonds, and securities of any kind, including brokerage accounts listed in response to No. 6 above.
8. A list of all persons or entities whom Defendant/Judgment Debtor is presently employed by, rendering services to, under contract to render services to, or leasing equipment to, setting forth the name and address of each such person or entity.
9. A list of all accounts receivable of Defendant/Judgment Debtor, and any assignments or disposition of said accounts, other than by collection, made in the last three years, including the name of the account, the date the account was assigned or otherwise disposed of, the name and address of each assignee or transferee, whether the assignment or disposition covered only present accounts receivable, whether or not the assignment or other disposition also included future accounts receivable, and, if so, to what extent, and the amount of consideration received for such assignment or other disposition.

10. A list of any claims or causes in action of any nature whatsoever owned by Defendant/Judgment Debtor, including the nature of the claim, the name and address of each person whom Defendant/Judgment Debtor claims is liable, whether the claim or chose in action is for a liquidated amount, the amount claimed as damages, whether any suit or action has been brought to reduce the claim to judgment, and, if so, the title and number of the case and the Court in which the action is pending, the date of the filing of the action, and the current status of the case; whether any offer of settlement has been made, and if so, by whom and for what amount, and whether any compromise agreement has been reached, and, if so, the further acts required to effect a settlement.

11. A list of any real or personal property for which Defendant/Judgment Debtor has given consideration, which property has been conveyed or transferred and is now being held for Defendant in the name of some person or entity other than Defendant/Judgment Debtor, including the name and address of each title holder, the date each conveyance of transfer was made, a description of each item or piece of property conveyed, and the amount of consideration given for such property.

12. A list of all real or personal property which Defendant/Judgment Debtor has conveyed or disposed of in the last three years, either by sale, gift, or otherwise, including a description of the property disposed of, the date of disposition, the name and address of each person to whom disposition was made, how disposition was made, by sale, gift, or otherwise, and what consideration was received.

13. A list of all present creditors of Defendant/Judgment Debtor, including the name and address of each creditor, the amount of the debt owed, the date the debt was incurred, the consideration received by Defendant for the debt, and a description of the security given to secure the debt.

14. All personal financial statements of Defendant/Judgment Debtor, and copies of inventories of the real and personal property of Defendant/Judgment Debtor for the last three years.

15. A list of all lawsuits pending against Defendant/Judgment Debtor, including the courts in which such suits are pending, the titles and numbers of the suits, the nature of such suits, and the possible liabilities thereunder.

16. A list of all lawsuits in which Defendant/Judgment Debtor has been involved within the last three years which have now been terminated either by judgments or settlements, the courts in which such suits were pending, the titles and numbers of the suits, the nature of the suits, and the outcomes.

17. A list of all judgments obtained by Defendant/Judgment Debtor against any parties which have not been collected, the amounts of said judgments, and the names and addresses of the parties indebted therefor.

18. A copy of all loan applications submitted by Defendant/Judgment Debtor during the last three years.

19. A copy of all communications, including e-mails, with any third party regarding stock in which Defendant/Judgment Debtor owns or claims an interest, for the last three years.

20. Statements of Defendant/Judgment Debtor's interest in any retirement plan or 401(k) for the past three years.

21. The present plan document for any retirement plan, including but not limited to a 401(k) plan, to which you are a participant.

22. Accounting books or records relating to any assets, including any closely-held business, owned by Defendant/Judgment Debtor, or which Defendant/Judgment Debtor claims any interest in, for the past three years.

23. Records of salary or other money Defendant/Judgment Debtor received from any source for the past three years.

24. Records of any inheritance Defendant/Judgment Debtor might have received in the past three years.

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