

2. Defendant Ameriquest Mortgage Company does not object to the relief requested herein.
3. Defendant Innovative Marketing, Inc., d/b/a Lead Extreme does not object to the relief requested herein.

I. RELIEF REQUESTED


Plaintiff seeks to amend his complaint in order to:

4. Properly name Defendant Ameriquest Mortgage Company, Inc. as Ameriquest Mortgage Company.
5. Add Defendants Innovative Marketing, Inc., d/b/a Lead Extreme, Go Apply, Inc., d/b/a eLeadZ, The Loan Page, Inc., and John Does 1 – 50.
6. Assert claims not plead in the state court action and based upon the federal CAN-SPAM Act of 2003, 15 U.S.C. § 7701 et seq.

WHEREFORE, Plaintiff respectfully moves this Court for an Order allowing him to Amend his Complaint.

Respectfully submitted,

HUMPHREYS WALLACE HUMPHREYS, P.C.

By:  _____

David Humphreys, OBA #12346
Luke J. Wallace, OBA #16070
1724 East Fifteenth Street
Tulsa, Oklahoma 74104
(918) 747-5300/(918) 747-5311 FAX

AND

Michael R. McKee, OBA # 6018
McKee Law Firm
PO Box 1351
Norman, OK 73070

405-360-2322

Attorneys for the Plaintiff

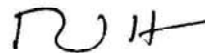
CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2005, a true and correct copy of the foregoing instrument was mailed by depositing same in the U.S. Mail, proper postage thereon fully prepaid, and addressed to:

Kalley R. Aman
Michael J. Cereseto
Buchalter Nemer Fields & Younger
601 Figueroa Street, Suite 2400
Los Angeles, CA 90017
Kaman@buchalter.com
mcereseto@buchalter.com
Attorneys for the Defendant

Terry D. Kordeliski
Robert A. Nance
Riggs Abney Neal Turpen Orbison Lewis
5801 North Broadway Ave., Suite 101
Oklahoma City, OK 73118
TKordeliski@RiggsAbney.com
rnance@riggsabney.com
Attorneys for the Defendant

Phillip L. Free, Jr.
Marie S. Johnston
Crowe & Dunlevy, P.C.
20 North Broadway
Suite 1800
Oklahoma City, OK 73102
freephil@crowedunlevy.com
johnstom@crowedunlevy.com
Attorney for Cross-Defendant, Innovative Marketing, Inc.d/b/a Lead Extreme



David Humphreys