

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, *ex rel.* OFFICE OF
MANAGEMENT AND ENTERPRISE
SERVICES,

Plaintiff,

v.

KLEO, INC., d/b/a, CLASSWALLET,

Defendant.

Case No: 25-cv-01147-HE

MOTION TO WITHDRAW

Attorney General Gentner Drummond hereby moves the Court to allow him to withdraw his appearance in this case *ex officio*. After reviewing the briefing on Defendant's Motion to Dismiss, the Attorney General reaffirms his conclusion—stated when this Office entered its original appearance in February 2024—that Plaintiff's claims are wholly without merit and, if pursued, risk an award of attorneys' fees in favor of Defendant. Two independent audits confirm as much. Defendant is capably represented by counsel who can address these claims. The Attorney General declines to lend his Office's imprimatur to claims he believes lack any basis in law or fact. For those same reasons, Solicitor General Garry Gaskins and Assistant Solicitor General Samuel Black also move the Court to allow them to withdraw.

The filing of this Motion constitutes reasonable notice to the parties of the Attorney General's intent to withdraw, as required by LCvR 83.5.

Respectfully Submitted,

s/ Garry M. Gaskins, II

GENTNER F. DRUMMOND, OBA NO.
16645

Attorney General

GARRY M. GASKINS II, OBA 20212

Solicitor General

SAMUEL BLACK, OBA NO. 34614

Assistant Solicitor General

OFFICE OF ATTORNEY GENERAL

STATE OF OKLAHOMA

313 N.E. 21st Street

Oklahoma City, OK 73105

Direct: (405) 521-3921

Gentner.Drummond@oag.ok.gov

Garry.Gaskins@oag.ok.gov

Samuel.Black@oag.ok.gov

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of December, 2025, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the ECF registrants with entries of appearance filed of record.

s/ Garry M. Gaskins, II

Garry M. Gaskins, II

Solicitor General