

IN THE DISTRICT COURT OF TULSA COUNTY
STATE OF OKLAHOMA

DISTRICT COURT
FILED
MAY 16 2003
SALLY HOWE BATH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

D. BARTLETT,

Plaintiff,

vs.

S. BARTLETT,

Defendant.

Case No. FD-2002-522
Judge Haskins

**MOTION FOR PARTIAL SUMMARY
JUDGMENT AND BRIEF IN SUPPORT**

The Plaintiff, Dewey F. Bartlett, Jr. (Dewey), moves for summary judgment regarding the determination of his separate property. There is no substantial controversy as to any material fact or as to the law governing characterization of separate property. Plaintiff offers the following points and authorities for the Court's consideration.

Background

Dewey inherited a substantial interest in Keener Oil Company (KOC) and/or other Bartlett family assets in 1975, following the death of his paternal uncle, David A. Bartlett. The interest in the oil company was held in trust for Dewey and his two siblings. Dewey was co-trustee and a non-family member was the other co-trustee. From 1975 until 1987, KOC was run by a non-family hired manager. Dewey married Susan Bartlett (Susan) in 1982. In 1987, Dewey received distribution of the bulk of trust assets and took control of the management of KOC. Dewey earned a salary for his management duties, distinct from his interest distribution from KOC. During most of his 20-year marriage to Susan, Dewey personally managed his assets, which consisted of KOC,

