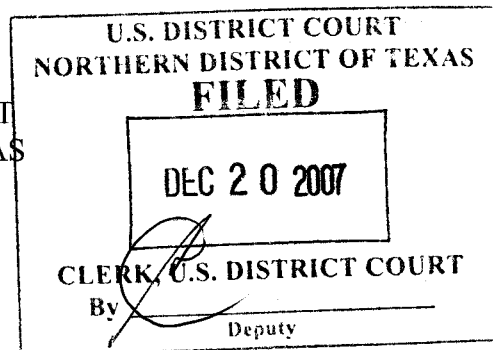


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



MICHAEL J. QUILLING, Receiver for ABC
VIATICALS, INC. and Related Entities,

Plaintiff,

vs.

INTERNATIONAL FIDELITY & SURETY
LIMITED, INTERNATIONAL CONSULTANTS
& MANAGEMENT LTD., SURETY
MARKETING SOURCE, LLC, KPMG
VANUATU, HAWKES LAW, KPMG
INTERNATIONAL, BOSWELL, DERMOTT &
PALWETT, LLP, MOHAN & ASSOCIATES,
DAVID A. GOLDENBERG, DAG
INVESTMENTS, LLC, LPG INVESTMENTS,
LLC, WED MARKETING, LLC, GALAX
HOLDINGS, LTD., MARK WOLOK, LINDA
WOLOK and ARIE KOTLER

Defendants.

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Civil Action No.: 3:07-CV-0421

ECF

AGREED PROTECTIVE ORDER

On this date the Court considered the Plaintiff’s Motion for Agreed Protective Order. By their signatures below, counsel for both parties consent to the entry of this Agreed Protective Order relating to the following documents: (1) six undated letters, (2) one letter dated October 2, 2007, (3) three letters dated October 9, 2007, and (4) one undated note accompanying a pre-recorded CD of music (collectively, “Documents”). After considering the motion, the agreed nature of the relief sought, and the pleadings on file in this case, the Court finds that the motion should be GRANTED.

1. IT IS THEREFORE ORDERED that Lisa Portney-Goldenberg, through her counsel, shall make the original Documents available to the Plaintiff’s counsel for inspection

only. The Documents shall be made available at a mutually convenient time and place, which shall not be disclosed by Plaintiff or his counsel to any other person, firm, or entity. Plaintiff's counsel shall not copy, image, abstract, or otherwise memorialize the contents of the Documents, or any of them, nor disclose their contents to any person other than Plaintiff or his counsel.


2. IT IS ORDERED that, in the event that Plaintiff believes the Documents are relevant to the claims or defenses in this matter, Plaintiff may seek to compel further production of the Documents by filing a motion in accordance with FED. R. CIV. P. 45. Any such motion shall give Ms. Portney-Goldenberg notice, an opportunity to present all defenses available to her, and an opportunity to request further protective orders as she deems appropriate. No person, firm, or entity may assert that producing the Documents under Paragraph 1 of this Agreed Protective Order requires further production of the Documents or adversely affects Ms. Portney-Goldenberg's right to raise the marital or spousal privilege to any request for production of the Documents.

3. IT IS ORDERED that production of the Documents under Paragraph 1 of this Agreed Protective Order shall, for all purposes, be deemed and construed as an involuntary disclosure by Ms. Portney-Goldenberg. Ms. Portney-Goldenberg's compliance with this Agreed Protective Order shall not be construed as or asserted to constitute: (1) a voluntary disclosure of the Documents, (2) a waiver by Ms. Portney-Goldenberg of the marital or spousal privilege as it applies to the Documents, (3) a waiver of or bar to her claim that the marital or spousal privilege protects the Documents from involuntary disclosure or production, or (4) a bar to the assertion that the marital or spousal privilege prohibits further production or disclosure of the Documents.

4. IT IS ORDERED that Plaintiff and Plaintiff's counsel shall not disclose to any person, firm, or entity the contents of the Documents, or any of them, unless authorized by

further orders of this Court under Paragraph 2 of this Agreed Protective Order and subject to any restrictions therein.

SIGNED this 20th day of December, 2007.



JORGE A. SOLIS
UNITED STATES DISTRICT JUDGE

Approved as to form and content:

/s/ Bruce S. Kramer

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