

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

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

VS.

ABC VIATICALS, INC.,  
C. KEITH LAMONDA,  
and JESSE W. LAMONDA, JR.,

Defendants,

and

LAMONDA MANAGEMENT FAMILY  
 LIMITED PARTNERSHIP,  
 STRUCTURED LIFE SETTLEMENTS, INC.,  
 BLUE WATER TRUST,  
 and DESTINY TRUST

Relief Defendants.

Civil Action No.: 3:06-CV-2136-P

**RECEIVER'S UNOPPOSED MOTION TO ESTABLISH CLAIM  
PROCEDURE PLAN AND TO APPROVE CLAIM FORM  
AND REQUEST FOR EXPEDITED CONSIDERATION**

TO THE HONORABLE JORGE A. SOLIS, UNITED STATES DISTRICT JUDGE:

COMES NOW, Michael J. Quilling, (“Receiver”), the Receiver appointed by the Court in these proceedings and files this his Motion to Establish Claim Procedure Plan and to Approve Claim Form and in support of such would respectfully show unto the Court as follows:

1. On November 17, 2006, the Securities and Exchange Commission (“SEC”) initiated these proceedings and sought the appointment of a receiver. On that same day, the

Court issued its Order Appointing Receiver pursuant to which Michael J. Quilling was appointed receiver and he has continued to function in that capacity since that time.

2. Given the currently known information regarding the operations of the entities involved in this receivership, the Receiver suggests that the following procedures be implemented as a claims procedure plan:

- An Official Claim Form in the format of Exhibit "A" attached hereto will be sent to any person believed to be an investor of the various defendants;
- An Official Claim Form in the format of Exhibit "B" attached hereto will be sent to any potential non-investor claimant (*i.e.* trade vendors) of the various defendants, at such time as those potential claimants are identified by the Receiver;
- A cover letter in the format of Exhibit "C" attached hereto will be sent along with each claim form;
- The Claim Form must be returned to the Receiver within 60 days after the Claim Form is mailed to the potential claimant. Failure to timely return a Claim Form may be grounds to disallow the claim;<sup>1</sup>
- As a Claim Form is received, it will be assigned a sequential claim number to be used to identify the claim during further proceedings before this Court;
- As a Claim Form is received, a post card in the format of Exhibit "D" attached hereto will be sent to each claimant;

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<sup>1</sup> The Receiver does not intend to use such a deadline as a hard and fast rule to penalize claimants but rather only as a means to prompt a timely return of the completed form. The Receiver intends to make exceptions to the deadline as circumstances dictate.

- Exhibits "A", "B", "C", and "D" will be translated into Mandarin Chinese and Spanish for the benefit of the numerous foreign investors.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that upon final consideration of this motion that the Court enter an order consistent with the foregoing requested relief and for such other and further relief, general or special, at law or in equity, to which the Receiver may show himself justly entitled.

Dated: January 16, 2007

Respectfully submitted,

QUILLING, SELANDER, CUMMISKEY  
& LOWNDS, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, Texas 75201  
(214) 871-2100 (Telephone)  
(214) 871-2111 (Facsimile)

By: /s/ Michael J. Quilling  
Michael J. Quilling  
State Bar No. 16432300  
D. Dee Raibourn, III  
State Bar No. 24009495  
Brent Rodine  
State Bar No. 24048770

ATTORNEYS FOR RECEIVER

#### **CERTIFICATE OF CONFERENCE**

I hereby certify that prior to the filing of this motion, I contacted counsel for the SEC and the Defendants and they agree to the relief requested.

/s/ Michael J. Quilling  
Michael J. Quilling/ D. Dee Raibourn, III

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16th of January, 2007, a true and correct copy of the foregoing document was served via electronic notice to all parties requesting same.

/s/ Michael J. Quilling  
Michael J. Quilling