

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

SECURITIES AND EXCHANGE COMMISSION, §

Plaintiff, §

vs. §

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

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. §

**MOTION TO APPROVE STIPULATION EXTENDING
DONALD S. KAPLAN'S TIME TO RESPOND**

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

COMES NOW Michael J. Quilling as the Receiver for ABC Viaticals, Inc. ("Receiver") and requests that this Court approve the parties' stipulation extending the time for Donald S. Kaplan to respond to the Receiver's Motion for Show Cause Hearing [Dkt. No. 44]. In support of this Motion, the Receiver would respectfully show unto the Court as follows:

1. The parties agree that Respondent Donald S. Kaplan shall have an additional 21 days to obtain local counsel and prepare an answer to the Receiver's Motion for Show Cause Hearing [Dkt. No. 44].

2. Accordingly, the parties have consented to entry of the stipulation attached as Exhibit "A", which would require Respondent Donald S. Kaplan to file his response by June 1, 2007.

WHEREFORE, premises considered, the Receiver respectfully requests that this Court approve and enter the stipulation attached as Exhibit "A".

Dated: May 10, 2007

Respectfully submitted,

**QUILLING, SELANDER, CUMMISKEY
& LOWNDS, P.C.**

2001 Bryan Street, Suite 1800
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By: /s/ Brent Rodine
Michael J. Quilling
State Bar No. 16432300
Brent Rodine
State Bar No. 24048770

ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

According to Local Rule 7.1, I participated in a telephone conference with Richard Baum, the Respondent's counsel in California, on May 8, 2007. Both parties agree to the relief requested in this motion.

/s/ Brent Rodine
Brent Rodine

CERTIFICATE OF SERVICE

On May 10, 2007, a copy of this motion was served on all interested parties through the Court's electronic filing system and by first class mail, postage prepaid, to the following:

Richard Baum
2215 Colby Avenue
Los Angeles, CA 90064-1504

/s/ Brent Rodine

Brent Rodine