

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 SECOND 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 second 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 additional fourteen (14) 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 15, 2007.

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

Dated: May 31, 2007 Case 3:06-cv-02136 Document 53 Filed 06/01/2007 Page 2 of 3

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/ Brent Rodine

Michael J. Quilling  
State Bar No. 16432300  
Brent J. 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 J. Rodine

**CERTIFICATE OF SERVICE**

On May 31, 2007, a copy of this motion was served on all interested parties through the Court's electronic filing system. Counsel for Donald S. Kaplan is already in possession of a copy of this motion.

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

Case 3:06-cv-02136 Document 53 Filed 06/01/2007 Page 3 of 3

/s/ Brent Rodine

Brent J. Rodine