

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

[illegible]

CIVIL ACTION NO.  
3-06-CV-2136-P

**RECEIVER'S AGREED MOTION TO APPROVE  
COMPROMISE AND SETTLEMENT AGREEMENT AND  
REQUEST FOR EXPEDITED CONSIDERATION**

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

COMES NOW, Michael J. Quilling, the Receiver appointed in these proceedings (“Receiver”), and files this his Agreed Motion to Approve Compromise and Settlement Agreement and in support of such would respectfully show unto the Court as follows:

1. By Orders dated November 17, 2006 and December 4, 2006, respectively, the Receiver was appointed in these proceedings.

2. As part of his duties, the Receiver has conducted a tracing of funds to determine potential receivership assets. Many of those assets are in the possession of one or more of the LaMonda family members. The Receiver has made demand for those assets to be surrendered.

3. As a result of substantial arms-length negotiation, an agreement has been reached between the Receiver and the LaMonda family members regarding disposition of those assets. A true and correct copy of the proposed Compromise and Settlement Agreement is attached hereto as Exhibit "A" and incorporated herein by reference for all purposes.

4. Given the uncertainties of litigation and the attendant cost, the Receiver believes that the proposed settlement is in the best interest of the Receivership Estate and will result in substantial additional monies being recovered by the Receivership Estate.

WHEREFORE, PREMISES CONSIDERED, the Receiver prays that upon final consideration of this motion that the Court approve the agreement and for such other relief, general or special, at law or in equity, to which the Receiver may show himself justly entitled.

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 conferred with counsel for the SEC, the Examiner, and all counsel for the parties herein and all of them agree to the relief requested.

/s/ Michael J. Quilling  
Michael J. Quilling

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th of July, 2007, a true and correct copy of the foregoing document was served via electronic notice to all parties requesting same and to:

**Via facsimile to (954) 713-7700:**

Richard L. Rosenbaum  
Arnstein & Lehr, LLP  
200 East Las Olas Boulevard, Suite 1700  
Ft. Lauderdale, FL 33301-2240  
COUNSEL FOR LEIGH BRADLEY

/s/ Michael J. Quilling  
Michael J. Quilling

This motion will also be posted on the Receiver's website, [www.secreceiver.com](http://www.secreceiver.com), after filing.