

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. §

§

**RECEIVER'S UNOPPOSED MOTION TO SELL VEHICLE
FREE AND CLEAR OF ALL LIENS, CLAIMS, AND ENCUMBRANCES
(2004 Panther Airboat and Aluminum Trailer)**

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

Michael J. Quilling, the Receiver appointed in these proceedings, ("Receiver") files this unopposed motion to sell the 2004 Panther Airboat and trailer free and clear of all liens, claims, and encumbrances and would respectfully show the Court as follows:

1. On November 17, 2006, the Securities and Exchange Commission ("SEC") initiated these proceedings and requested the appointment of a receiver for ABC Viaticals, Inc. and other related entities. *Complaint* [Dkt. No. 1]. The Court appointed Michael J. Quilling as

Receiver for those parties and he has continued to serve in that capacity. *Order Appointing Receiver* [Dkt. No. 8].

2. One asset of the receivership estate is an 18' 2004 Panther Airboat, Hull No. PAP000671204, and aluminum trailer (the "Boat") which is titled in the name of Keith LaMonda.

3. Since taking possession of the Boat, the Receiver has obtained an offer from Sterling Life Settlements, LLC to purchase the Boat for \$20,000.00 in furtherance of the Receiver's settlement agreement with the LaMondas. That offer is subject to this Court's final approval.

4. The Receiver believes that the proposed purchase price represents the Boat's fair market value and that this sale is in the receivership estate's best interest. The Boat is still relatively new and, therefore, its fair market value is likely to decline quickly. Based on its condition, the NADA lists the combined resale value for the boat and trailer as "generally lower" than \$24,710.00. Furthermore, since the proposed buyer is located in Florida and willing to purchase the Boat as-is, the receivership estate will not have to incur transportation or repair costs in connection with this sale. The Receiver, therefore, requests authority to sell the Boat to Sterling Life Settlements, LLC free and clear of all liens, claims, and encumbrances. To the Receiver's knowledge, there are no liens, claims, or encumbrances against the Boat.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests authority to sell the 2004 Panther Airboat and aluminum trailer to Sterling Life Settlements, LLC and consummate a contract for sale consistent with the foregoing, and for such other and further relief, general or special, at law or in equity, to which the Receiver may show himself justly entitled.

