

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.,

ECF

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
(2006 Jeep Grand Cherokee Overland)**

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 2006 Jeep Grand Cherokee Overland 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 the Defendants and Relief Defendants. *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 a 2006 Jeep Grand Cherokee Overland, VIN #1J8HS68266C302303, (the “Vehicle”) which is titled in the name of Summit Marketing Consultants, LLC.

3. Since taking possession of the Vehicle, the Receiver has been actively marketing it for sale. As a result of his efforts, the Receiver has received an offer from Cathy Pinnell to purchase the Vehicle for \$16,500.00, subject to this Court’s final approval. The Receiver believes that the purchase price represents the fair market value of the Vehicle and that this sale is in the receivership estate’s best interest. The Vehicle is still relatively new and, accordingly, its fair market value is likely to decline quickly. Based on its condition, the Kelley Blue Book resale value is currently between \$18,355.00 and \$19,165.00. However, the interior has a strong odor of cigar smoke and the exterior has undergone significant repairs following a wreck. The Receiver, therefore, seeks authority to sell the Vehicle to Cathy Pinnell free and clear of all liens, claims, and encumbrances. To the Receiver’s knowledge, there are no known liens, claims, or encumbrances against the Vehicle.

WHEREFORE, PREMISES CONSIDERED, the Receiver requests that this Court authorize him to sell the 2006 Jeep Grand Cherokee Overland to Cathy Pinnell 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.

