

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,	§	ECF
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 Jeep Liberty Renegade)**

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 Jeep Liberty Renegade 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 2004 Jeep Liberty Renegade Sport Utility, VIN #1J8GK38KX4W155635, (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. The Receiver has received an offer from Chad LaMonda to purchase the Vehicle for \$7,000.00, subject to this Court's final approval. The Receiver believes that the purchase price represents the fair market value of the Vehicle in its current condition. The Vehicle presently needs cosmetic repairs as the result of a collision. Not taking that into account, the Kelley Blue Book resale value is currently \$8,545.00. The cost of repairs, however, would greatly exceed the \$1,545.00 difference offered by Chad LaMonda. The Receiver, therefore, believes that this sale is in the receivership estate's best interests and requests that this Court authorize him to sell the Vehicle to Chad LaMonda 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 enter an order authorizing him to sell the 2004 Jeep Liberty Renegade to Chad LaMonda 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.

