

**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 LA MONDA  
JESSE W. LA MONDA, JR.

Defendants,

and

LAMONDA MANAGEMENT FAMILY LIMITED  
 PARTNERSHIP,  
 STRUCTURED LIFE SETTLEMENTS, INC.  
 BLUE WATER TRUST, and  
 DESTINY TRUST,

Relief Defendants.

Civil Action No.

3-06-CV-2136-P

**AGREED ORDER FOR PROTECTION OF PRIVATE  
FINANCIAL RECORDS AND INFORMATION PROVIDED  
BY DONALD S. KAPLAN TO RECEIVER MICHAEL QUILLING  
PURSUANT TO SETTLEMENT NEGOTIATIONS**

COMES NOW Donald S. Kaplan and submits this Agreed Order for Protection of  
Private Financial Records and Information Provided by Donald S. Kaplan to Receiver

Michael Quilling Pursuant to Settlement Negotiations. Kaplan respectfully shows the Court as follows:

1. This proceeding is a motion for Show Cause Hearing brought by Receiver Michael Quilling ("the Receiver") against Donald S. Kaplan. Following substantial discovery, the parties have engaged in discussions aimed at resolving this proceeding.

2. In order for the Receiver to fully evaluate the terms of the settlement proposal made by Kaplan, the Receiver has requested that Kaplan produce substantial records and documents (collectively "information") related to his finances and financial condition. This information is private, and Kaplan has agreed to provide this information so long as the information is protected from disclosure.

3. The information produced and disclosed is confidential and subject to a claim of privilege based upon laws of privacy.

4. The tax returns are confidential and subject to a claim of privilege based upon California law.

5. The production of these documents and tax returns does not waive the claims of privilege in this action or any other action.

6. The information is produced pursuant to settlement negotiations which are privileged under Federal Rules of Evidence Rule 408, and the production herein shall not waive or in any way prejudice objections to the subsequent production or admission of any such documents and information.

7. The information shall not disclosed or disseminated to any person except:

a) the attorneys of record in the Quilling v Kaplan Motion for Show Cause proceeding,

b) the attorneys of records' staff,

c) experts retained by the attorneys of record,

d) the attorneys of record for the Securities and Exchange Commission in the SEC v ABC Viaticals case,

Provided that each of those persons first agrees in writing not to disclose the documents and information contained therein to any person who is outside of the permissible parties to whom disclosure may be made'

**IT IS SO ORDERED** this 31<sup>st</sup> day of March, 2008.



JORGE A. SOLIS  
UNITED STATES DISTRICT JUDGE

Approved as to form and content:

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