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.

Civil Action No.: 3:06-CV-2136-P

UNOPPOSED MOTION TO EXTEND JASON SUN'S RESPONSE DEADLINE

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

COMES NOW Michael J. Quilling as the Receiver for ABC Viaticals, Inc. ("Receiver") and requests that this Court enter an order extending by 30 days the response date to the Receiver's Motion for Show Cause Hearing Regarding Commissions Paid to Jason Sun [Dkt. No. 226]. In support, the Receiver would respectfully show as follows:

1. On April 16, 2009, the Receiver filed his Motion for Show Cause Hearing Regarding Commissions Paid to Jason Sun [Dkt. No. 226] and arranged delivery to Jason Sun's address.

- 2. On May 7, 2009, the Court entered its Order [Dkt. No. 227] directing Jason Sun to file a response within 10 days.
- 3. On May 8, 2009, an attorney located in Dallas, Texas, contacted the Receiver's counsel about this matter. He stated that Mr. Sun had asked to retain him. Although he does not formally represent Mr. Sun at this time, that attorney believes that he will take the representation and needs an additional 30 days to investigate the matter and file a response. He asked the Receiver to seek a 30-day extension out of professional courtesy. The Receiver does not oppose the extension while Mr. Sun obtains counsel.

WHEREFORE, premises considered, the Receiver asks that this Court enter an order extending Jason Sun's response date by 30 days to June 16, 2009. The Receiver also asks for such other and further relief, general or special, at law or in equity, to which he may otherwise show himself 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/ Brent Rodine

Michael J. Quilling State Bar No. 16432300 Brent Rodine State Bar No. 24048770

ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

The SEC and Examiner are not opposed to the relief requested in this motion.

/s/ Brent Rodine

CERTIFICATE OF SERVICE

A copy of this pleading was served on all interested parties through the Court's electronic filing system.

/s/ Brent Rodine