

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. §

**MOTION FOR SECOND AGREED ORDER
EXTENDING JASON SUN'S RESPONSE DATE**

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

Michael J. Quilling, the Receiver for ABC Viaticals, Inc. and other related entities, ("Receiver") asks the Court to enter the parties' Agreed Order extending the date for Jason Sun to respond to the Receiver's Motion for Show Cause Hearing Regarding Commissions Paid to Jason Sun [Dkt. No. 226]. In support of this motion, the Receiver would respectfully show the Court 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. Jason Sun's current counsel of record contacted the Receiver on May 8, 2009, to request an additional 30 days to gather facts and investigate whether he would represent Mr. Sun in that matter. The Court entered an order [Dkt. No. 229] extending Mr. Sun's response date until June 16, 2009.

4. Counsel for both parties recently met in person to discuss this matter and try to reach a resolution without court intervention. They believe that, if settlement can be reached, they can do it within 60 days.

5. Accordingly, the parties have prepared a Second Agreed Order Extending Jason Sun's Response Date until August 14, 2009. A copy of that order is attached as Exhibit A.

WHEREFORE, premises considered, the Receiver asks this Court to enter the Second Agreed Order Extending Jason Sun's Response Date attached as Exhibit A and grant 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.**

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By: /s/ Brent Rodine
Michael J. Quilling
State Bar No. 16432300
Brent Rodine
State Bar No. 24048770

ATTORNEYS FOR RECEIVER

CERTIFICATE OF CONFERENCE

According to Local Rule 7.1, the undersigned personally conferred with Bill Wray, Jason Sun's counsel of record, on June 12, 2009, and it was determined that both parties agree 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