

Exhibit “A”

In the High Court of Justice

Claim No HC10C02105

Chancery Division

Royal Courts of Justice

B e t w e e n

ABC VIATICALS INC (in receivership)

Claimants

-and-

DMH STALLARD (a firm)

Defendants

DRAFT CONSENT ORDER

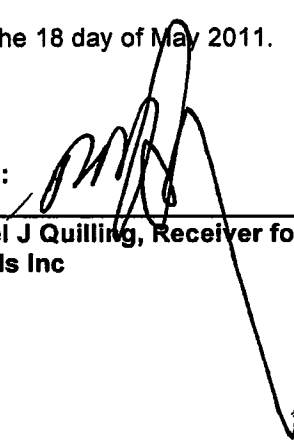
UPON THE APPLICATION of the Parties

AND BY CONSENT ORDERED that

All proceedings in this action be stayed on the terms set out in the Schedule hereto.

Dated the 18 day of May 2011.

Signed:


Michael J Quilling, Receiver for ABC
Viaticals Inc

Signed:


Solicitors for the Defendants

Simmons & Simmons LLP
CityPoint
One Ropemaker Street
London EC2Y 9SS

SCHEDULE

1. The Defendants do pay the sum of £845,290.35 in full and final settlement of the Claimant's claim including interest and costs.
2. The payment in paragraph 1 above is made without admission of liability.
3. The terms of this settlement are confidential to the parties and their professional advisers, and insurers and may not be disclosed to any third party save by consent or by order of the Court, or as may be required by law.
4. The Claimant undertakes to use his best endeavours to assist the Defendants in the defence of any claims that may be made against them arising out of matters in relation to which the Claimant has and to provide such information and/or documentation that the Claimant may possess which may assist the Defendants.