### IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

MICHAEL J. QUILLING, Receiver for ABC VIATICALS, INC. and Related Entities,	§ §	
Plaintiff,	§ §	
	§	
VS.	§	Civil Action No.: 3:07-CV-0421
	§	
INTERNATIONAL FIDELITY & SURETY	§	ECF
LIMITED, INTERNATIONAL CONSULTANTS	§	
& MANAGEMENT LTD., SURETY	§	
MARKETING SOURCE, LLC, KPMG	§	
VANUATU, HAWKES LAW, KPMG	§	
INTERNATIONAL, BOSWELL, DERMOTT &	§	
PAWLETT, LLP, MOHAN & ASSOCIATES,		
DAVID A. GOLDENBERG, DAG	§	
INVESTMENTS, LLC, LPG INVESTMENTS,		
LLC, WED MARKETING, LLC, GALAX	0	
HOLDINGS, LTD., MARK WOLOK, LINDA	§	
WOLOK and ARIE KOTLER.	§	
	§	
	0	

Defendants

# MOTION TO DISMISS WITHOUT PREJUDICE AS TO DEFENDANT LINDA WOLOK

# TO THE HONORABLE JORGE SOLIS, UNITED STATES DISTRICT JUDGE:

COMES NOW, Michael J. Quilling ("Plaintiff"), and files this his Motion to Dismiss

§

Without Prejudice as to Defendant Linda Wolok and, in support of such, would show the Court

as follows:

1. Linda Wolok is one of the named defendants in these proceedings. On March 12,

2007, Plaintiff caused Linda Wolok to be served with a Summons in these proceedings.

2. Subsequent to service, based upon information obtained from Linda Wolok, the

Plaintiff decided that it was no longer financially reasonable to continue pursuing the claims

asserted against her. No answer or other responsive pleading has been filed in these proceedings by Linda Wolok.

3. Accordingly, the Plaintiff requests that the Court dismiss without prejudice the claims asserted against Defendant Linda Wolok.

WHEREFORE, premises considered, the Plaintiff requests that these proceedings be dismissed against Linda Wolok and only Linda Wolok and for such other and further relief, general or special, at law or in equity, to which the Plaintiff may show himself justly entitled.

Respectfully submitted,

Quilling Selander Cummiskey & Lownds, P.C. 2001 Bryan Street, Suite 1800 Dallas, Texas 75201-4240 (214) 871-2100 (Telephone) (214) 871-2111 (Facsimile)

By:

/s/ Michael J. Quilling

Michael J. Quilling Texas State Bar No. 16432300 D. Dee Raibourn, III State Bar No. 24009495 Brent J. Rodine State Bar No. 24048770

ATTORNEYS FOR PLAINTIFF

Borod & Kramer, Pc Brinkley Plaza 80 Monroe, Suite G-1 Memphis, TN 38103 (901) 524-0200 (Telephone) (901) 523-0043 (Facsimile)

By:

/s/ Bruce Kramer

Bruce Kramer Tennessee Bar No. 7472

# SPECIAL COUNSEL FOR PLAINTIFF

# **CERTIFICATE OF SERVICE**

On April \_\_\_\_\_, 2007 a true and correct copy of the above and foregoing was sent via first class mail, with full and proper postage prepaid thereon, to:

Linda Wolok 7409 Village Square Drive West Bloomfield, MI 48322

/s/ Michael J. Quilling

Michael J. Quilling