

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. §
 §
 INTERNATIONAL FIDELITY & SURETY §
 LIMITED, INTERNATIONAL CONSULTANTS §
 & MANAGEMENT LTD., SURETY §
 MARKETING SOURCE, LLC, KPMG §
 VANUATU, HAWKES LAW, KPMG §
 INTERNATIONAL, BOSWELL, DERMOTT & §
 PALWETT, LLP, MOHAN & ASSOCIATES, §
 DAVID A. GOLDENBERG, DAG §
 INVESTMENTS, LLC, LPG INVESTMENTS, §
 LLC, WED MARKETING, LLC, GALAX §
 HOLDINGS, LTD., MARK WOLOK, LINDA §
 WOLOK and ARIE KOTLER §
 §
 Defendants. §

Civil Action No.: 3:07-CV-0421

ECF

WED MARKETING, LLC'S ANSWER TO PLAINTIFF'S COMPLAINT

COMES NOW WED MARKETING, LLC ("WED") and files its Answer in opposition to Plaintiff's Complaint as follows:

I. SPECIFIC RESPONSES

1. WED admits the allegations of paragraph 1.
2. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 2 and therefore denies it.
3. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 3 and therefore denies it.
4. WED is without knowledge or information sufficient to form a belief about the

truth of the averments of paragraph 4 and therefore denies it.

5. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 5 and therefore denies it.

6. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 6 and therefore denies it.

7. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 7 and therefore denies it.

8. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 8 and therefore denies it.

9. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 9 and therefore denies it.

10. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 10 and therefore denies it.

11. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 11 and therefore denies it.

12. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 12 and therefore denies it.

13. WED admits the averments of paragraph 13.

14. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 14 and therefore denies it.

15. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 15 and therefore denies it.

16. WED is without knowledge or information sufficient to form a belief about the

truth of the averments of paragraph 16 and therefore denies it.

17. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 17 and therefore denies it.

18. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 18 and therefore denies it.

19. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 19 and therefore denies it.

20. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 20 and therefore denies it.

21. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 21 and therefore denies it.

22. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 22 and therefore denies it.

23. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 23 and therefore denies it.

24. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 24 and therefore denies it.

25. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 25 and therefore denies it.

26. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 26 and therefore denies it.

27. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 27 and therefore denies it.

28. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 28 and therefore denies it.

29. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 29 and therefore denies it.

30. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 30 and therefore denies it.

31. Paragraph 31 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 30, they are again denied.

32. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 32 and therefore denies it.

33. Paragraph 33 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 32, they are again denied.

34. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 34 and therefore denies it.

35. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 35 and therefore denies it.

36. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 36 and therefore denies it.

37. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 37 and therefore denies it.

38. Paragraph 38 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 37, they are again denied.

39. WED is without knowledge or information sufficient to form a belief about the

truth of the averments of paragraph 39 and therefore denies it.

40. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 40 and therefore denies it.

41. Paragraph 41 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 40, they are again denied..

42. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 42 and therefore denies it.

43. Paragraph 43 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 42, they are again denied.

44. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 44 and therefore denies it.

45. Paragraph 45 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 44, they are again denied.

46. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 46 and therefore denies it.

47. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 47 and therefore denies it.

48. Paragraph 48 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 47, they are again denied.

49. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 49 and therefore denies it.

50. Paragraph 50 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 49, they are again denied.

51. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 51 and therefore denies it.

52. Paragraph 52 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 51, they are again denied.

53. WED is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 53 and therefore denies it.

54. WED denies the averments of paragraph 54.

55. Paragraph 55 does not require additional response, but to the extent that WED has denied the averments in paragraphs 1 through 54, they are again denied.

56. WED denies the averments of paragraph 56.

WHEREFORE, PREMISES CONSIDERED, WED Marketing, LLC prays that the Court render a take-nothing judgment against Plaintiff, that the Court assess costs against Plaintiff and award WED all other relief to which it is justly entitled.

Respectfully submitted,

/s/ Kimberly Sims

BRUCE K. PACKARD

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ATTORNEYS FOR WED MARKETING, LLC

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument was served upon the following on this 30th day of April, 2007.

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/s/ Kimberly Sims

KIMBERLY M.J. SIMS