

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.

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

ECF

DAG INVESTMENTS, LLC’S ANSWER TO PLAINTIFF’S COMPLAINT

COMES NOW DAG Investments, LLC (“DAG”) and files its Answer in opposition to Plaintiff’s Complaint as follows:

I. SPECIFIC RESPONSES

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

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

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

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

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

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

10. DAG admits the allegations of paragraph 10.

11. DAG admits the allegations of paragraph 11.

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

13. DAG is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 13 and therefore denies it.

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

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

16. DAG is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 16 and therefore denies it.

17. DAG is without knowledge or information sufficient to form a belief about the

truth of the averments of paragraph 17 and therefore denies it.

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

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

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

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

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

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

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

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

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

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

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

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

30. DAG 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 DAG has denied the averments in paragraphs 1 through 30, they are again denied.

32. DAG 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 DAG has denied the averments in paragraphs 1 through 32, they are again denied.

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

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

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

37. DAG 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 DAG has denied the averments in paragraphs 1 through 37, they are again denied.

39. DAG is without knowledge or information sufficient to form a belief about the truth of the averments of paragraph 39 and therefore denies it.

40. DAG 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 DAG has denied the averments in paragraphs 1 through 40, they are again denied..

42. DAG 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 DAG has denied the averments in paragraphs 1 through 42, they are again denied.

44. DAG 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 DAG has denied the averments in paragraphs 1 through 44, they are again denied.

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

47. DAG 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 DAG has denied the averments in paragraphs 1 through 47, they are again denied.

49. DAG 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 DAG has denied the averments in paragraphs 1 through 49, they are again denied.

51. DAG 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 DAG has denied the averments in paragraphs 1 through 51, they are again denied.

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

54. DAG denies the averments of paragraph 54.

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

56. DAG denies the averments of paragraph 56.

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

Respectfully submitted,

/s/ Kimberly Sims

BRUCE K. PACKARD

State Bar No. 15402300

THEODORE J. RINEY

State Bar No. 16935075

KIMBERLY M.J. SIMS

State Bar No. 24046167

RINEY PALTER PLLC

5949 Sherry Lane, Suite 1616

Dallas, TX 75225 - 8009

Telephone: (214) 461-1200

Facsimile: (214) 461-1210

ATTORNEYS FOR DAG INVESTMENTS, 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.

Michael J. Quilling
Brent Jason Rodine
Quilling Selander Cummiskey & Lownds
2001 Bryan St
Suite 1800
Dallas, Texas 75201

Bruce S. Kramer
Borod & Kramer
Brinkley Plaza
80 Monroe Suite G-1
Memphis, Tennessee 38103

/s/ Kimberly Sims

KIMBERLY M.J. SIMS