

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 §
 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 §

ECF

Defendants. §

**RECEIVER’S UNOPPOSEDMOTION TO APPROVE
 COMPROMISE AND SETTLEMENT AGREEMENT**

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

COMES NOW, Michael J. Quilling, in his capacity as Receiver for ABC Viaticals, Inc. and related entities (“Receiver”) and files this his Motion to Approve Compromise and Settlement Agreement, and in support of such would show unto the Court as follows.

1. By Orders dated November 17, 2006, and December 4, 2006, the Receiver was appointed to serve in *SEC v. ABC Viaticals, Inc., et al.*, Cause No. 3:06-CV-2136. (N.D. Tex) Subsequent to his appointment, the Receiver initiated this action.

2. As a result of the suicide of David A. Goldenberg, a Defendant in this litigation, the Receiver has negotiated a compromise and settlement agreement with his family members, the terms of which are set forth in Exhibit "1" attached hereto.

3. In essence, the Agreement allows the Receiver to obtain \$3 million of death benefits under a policy insuring the life of David Goldenberg. The Receiver believes that the Compromise and Settlement Agreement is in the best interest of the receivership estate and requests that it be approved by the Court.

4. In connection with approval of the Compromise and Settlement Agreement, the Receiver is submitting two orders which are (1) an Agreed Order Approving Compromise and Settlement Agreement; and (2) Agreed Order Amending First Amended Agreed Preliminary Injunction, which the Receiver requests that the Court enter if the Compromise and Settlement Agreement is approved.

WHEREFORE, PREMISES CONSIDERED, the Receiver prays that upon final consideration of this matter that the Court approve the Compromise and Settlement Agreement and enter the two submitted Orders, and for such other and further relief, general or special, at law or in equity, to which the Receiver may show himself justly entitled.

Respectfully submitted,

QUILLING, SELANDER, CUMMISKEY
& LOWNDS, P.C.
2001 Bryan Street, Suite 1800
Dallas, Texas 75201
(214) 871-2100 (Telephone)
(214) 871-2111 (Facsimile)

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

ATTORNEYS FOR RECEIVER

CERTIFICATE OF SERVICE

A true and correct copy of this motion will be served upon all interested parties through the Court's electronic filing system.

 /s/ Michael J. Quilling

This Motion will also be posted on the Receiver's website, www.secreceiver.com after filing.