

**BOUTIN DENTINO GIBSON
DI GIUSTO HOPELL INC.**
Chris Gibson, SBN 073353
Maralee MacDonald, SBN 208699
555 Capitol Mall, Suite 1500
Sacramento, CA 95814-4603
(916) 321-4444

Attorneys for Receiver
Michael J. Quilling

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

SECURE INVESTMENT SERVICES, INC.,
AMERICAN FINANCIAL SERVICES, INC.,
LYNDON GROUP, INC., DONALD F. NEUHAUS,
and KIMBERLY A. SNOWDEN,

Defendants.

Case No. 2:07-cv-01724 LEW CMK

STIPULATED MOTION FOR ORDER
AUTHORIZING RECEIVER TO
EMPLOY BOUTIN DENTINO
GIBSON DI GIUSTO HOPELL INC.;
ORDER

The parties, at the request of Michael J. Quilling, the Receiver appointed in these proceedings, (“Receiver”), respectfully submit this Stipulated Motion for Order Authorizing Receiver to Employ Boutin Dentino Gibson Di Giusto Hodell Inc. and Order under L.R. 66-232.

BACKGROUND

1. By Order of August 24, 2007, the Court appointed Michael J. Quilling as Receiver for Secure Investment Services, Inc. (“SIS”), American Financial Services, Inc. (“AFS”) and Lyndon Group, Inc. (“LGI”) and other related individuals and entities. In that capacity, the Court has authorized and charged the Receiver to take complete and exclusive control, possession, and custody of all receivership assets.

2. The Order Appointing Temporary Receiver authorizes the Receiver to employ attorneys as needed to preserve and maintain the Receivership Assets in this case:

1 Given the emergency nature of these proceedings, the Receiver is
2 hereby authorized to employ such employees, accountants, and
3 attorneys as is necessary and proper for the collection,
4 preservation, maintenance and operation of the Receivership
5 Assets and Receivership Records and to open bank accounts or
6 other depository accounts in the name of the Receiver on behalf of
7 the receivership estate. As soon as possible after retaining such
8 professionals, the Receiver shall file written applications to
9 retroactively approve the employment pursuant to Local Rule 66-
10 232(g).

11 *Order Appointing Temporary Receiver* [Dkt. No. 27] at ¶ 11.

12 3. Accordingly, the Receiver requests authority under L.R. 66-232(g) to employ
13 Boutin Dentino Gibson Di Giusto Hodell Inc. of Sacramento, California (“the Firm”) to act as
14 his legal counsel. The Firm has extensive experience in federal court practice in the Eastern
15 District of California. Profiles of principals Chris Gibson and Maralee MacDonald and their
16 practice experience are attached as Exhibit A.

17 4. The Receiver believes that employing the Firm is in the best interest of the
18 receivership estate because it has the experience and resources to efficiently and effectively
19 represent the Receiver in this case.

20 5. The Firm will provide legal representation in this case at the hourly rates set forth
21 in Exhibit B. The Receiver seeks Court approval to pay those amounts on a tentative basis
22 pending a hearing for final approval under L.R. 66-232.

23 6. The Receiver requests that this Court enter an order authorizing him to employ
24 Boutin Dentino Gibson Di Giusto Hodell Inc. and to compensate it consistent with the terms
25 described in Exhibit B.

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STIPULATION

WHEREFORE, THE PARTIES STIPULATE to the entry of an order of this Court authorizing the Receiver to employ Boutin Dentino Gibson Di Giusto Hodell Inc. and to compensate it consistent with the terms described in Exhibit B.

BOUTIN DENTINO GIBSON DI GIUSTO
HODELL INC.

Dated: August 29, 2007

By /s/ Maralee MacDonald
Maralee MacDonald
Attorneys for Receiver

SECURITIES EXCHANGE
COMMISSION

Dated: August 29, 2007

By /s/ John S. Yun (as authorized on August 29, 2007)
Thomas J. Eme
John S. Yun
Attorneys for Plaintiff Securities
Exchange Commission

KENNY, SNOWDEN & NORINE

Dated: August 29, 2007

By /s/ Mark Norcross (as authorized on August 29, 2007)
Mark Norcross
Attorneys for Defendants
Donald Neuhaus and
Kimberly Snowden

ORDER

IT IS SO ORDERED.

Dated: September 6, 2007

/s/ Ronald S. W. Lew
Honorable Ronald S. W. Lew
UNITED STATES DISTRICT COURT JUDGE

EXHIBIT B

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<u>NAME</u>	<u>HOURLY RATE</u>
Chris Gibson, Principal	\$350
Maralee MacDonald, Principal	\$275
Sheryl Stuckey, Paralegal	\$165