

1 **BOUTIN GIBSON DI GIUSTO HODELL INC.**  
Chris Gibson, SBN 073353  
2 Maralee MacDonald, SBN 208699  
555 Capitol Mall, Suite 1500  
3 Sacramento, CA 95814-4603  
(916) 321-4444  
4

5 **QUILLING, SELANDER, CUMMISKEY**  
**& LOWNDS, P.C.**  
Michael J. Quilling (Tex. Bar No. 16432300) – Admitted Pro Hac Vice  
6 D. Dee Raibourn, III (Tex. Bar No. 24009495) – Admitted Pro Hac Vice  
Brent J. Rodine (Tex. Bar No. 24048770) – Admitted Pro Hac Vice  
7 2001 Bryan Street, Suite 1800  
Dallas, TX 75201  
8 Telephone: (214) 871-2100  
9 Facsimile: (214) 871-2111

10 Attorneys for Michael J. Quilling  
Receiver of Defendants Secure Investment Services, Inc.,  
11 American Financial Services, Inc., and Lyndon Group, Inc.

12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA  
14 SACRAMENTO DIVISION

15 SECURITIES AND EXCHANGE COMMISSION,  
16  
17 Plaintiff,  
18 v.  
19 SECURE INVESTMENT SERVICES, INC.,  
AMERICAN FINANCIAL SERVICES, INC.,  
20 LYNDON GROUP, INC., DONALD F. NEUHAUS,  
and KIMBERLY A. SNOWDEN,  
21 Defendants.

Case No. 2:07-cv-01724 GEB CMK  
NOTICE OF REQUEST FOR  
EVIDENTIARY HEARING AND  
EXTENDED ARGUMENT UNDER  
LOCAL RULE 78-230  
Date of Hearing: July 28, 2008  
Time: 9:00  
Department: 10  
The Honorable Garland E. Burrell, Jr.

22 Pursuant to Local Rule 78-230(h) Receiver believes that there may be extended oral  
23 argument and presentation of evidence for the following motions currently set before this court  
24 on July 28, 2008, at 9:00 a.m.:

- 25 1. Receiver’s Motion for authorization to abandon ARM-A policy
- 26 2. Receiver’s Motion for authorization to abandon BAU-R&L(1) policy
- 27 3. Receiver’s Motion for authorization to abandon BER-E&B(1) policy
- 28 4. Receiver’s Motion for authorization to abandon BER-E&B(2) policy

1 5. Receiver's Motion for authorization to abandon FOW-S(1) policy

2 6. Receiver's Motion for authorization to abandon QUI-W(1) policy

3 7. Receiver's Motion for authorization to abandon QUI-W(2) policy

4 Receiver anticipates that presentation of his evidence would take approximately ninety  
5 minutes to two hours. Receiver anticipates the majority of this time would be to present  
6 testimony from the Receiver and possibly the Examiner, who would need to travel from out of  
7 state to appear at the hearing.

8 I have contacted counsel of record for the Securities and Exchange Commission, and  
9 defendant Kimberly Snowden and Linda Neuhaus as Administrator of the Estate of Donald  
10 Neuhaus. I am informed that the SEC and Mrs. Neuhaus do not oppose an evidentiary hearing as  
11 set in the notices of the above motions. I have not yet heard from counsel for Mrs. Snowden. I  
12 have not been in contact with the pro per investors who have submitted papers on these motions.

13 In the event that the Court deems it necessary to specially set an evidentiary hearing other  
14 than at the date and time these motions are currently set, the Receiver respectfully request notice  
15 so that appropriate travel arrangements for witnesses may be made.

16 Dated: June 12, 2008

Respectfully submitted,

17 BOUTIN GIBSON DI GIUSTO HODELL INC.  
18

19 By /s/ Maralee MacDonald

20 Maralee MacDonald

21 Attorneys for Receiver of Defendants Secure  
22 Investment Services, Inc., American Financial  
Services, Inc., and Lyndon Group, Inc.

23 MICHAEL J. QUILLING (Tex. Bar No. 16432300)

24 D. DEE RAIBOURN, III (Tex. Bar No. 24009495)

BRENT J. RODINE (Tex. Bar No. 24048770)

25 Attorneys for Receiver

26 QUILLING, SELANDER, CUMMISKEY &  
27 LOWNDS, P.C.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of June, 2008, a copy of this notice was served on all interested parties through the Court's electronic filing system. In addition, a copy of this notice was served on the following investors named as owners of the ARM-A Policy by U.S. Certified Mail, Return Receipt Requested:

Mark Damian Chips  
10815 Foothill Avenue  
Gilroy, CA 95020

Barbara W. Eberle  
2485 Grassy Springs Place  
Las Vegas, NV 89135

Bill and Mavis Hawk  
Family Trust  
599 Circlewood Drive  
Paradise, CA 95969

/s/ Maralee MacDonald

Maralee MacDonald

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 12<sup>th</sup> day of June, 2008, a copy of this notice was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served on the following investors named as owners of the BAU-R&L(1) Policy by U.S. Certified Mail, Return Receipt Requested:

Frances Beckett 1536 Wild Rye Drive Reno, NV 89509	Frank Caffaratti 1020 N. Cantlon Lane Reno, NV 89521	Mary Ann Cardoza 226 Firestone Drive Roseville, CA 95678
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Marie Rose Huval Frabbiele, TTRS 7777 Round Court Las Vegas, NV 89123	Arlene M. Jenkins 472 Dart Brook Place Henderson, NV 89012	William C. Kreger 1735 Lilac Lane Auburn, CA 95603
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Sharon L. Limroth 520 W. Riverview Circle Reno, NV 89509	Ralph and Barbara Musalo 1440 Grace Lane Nipomo, CA 93444	Clifford A. Palm, Jr. 6244 Longford Drive, #3 Citrus Heights, CA 95621
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David J. Parnham 7501 Sylvan Creek Court Citrus Heights, CA 95610	Philip and Victoria Roth 2531 Serene Moon Drive Henderson, NV 89044	Bazzle Johnnie Wilson, Jr. 1291 Nunneley Road Paradise, CA 95969
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/s/ Maralee MacDonald  
Maralee MacDonald

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I hereby certify that on the 12<sup>th</sup> day of June, 2008, a copy of this notice was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served on the following investors named as owners of the BER-E&B(1) Policy by U.S. Certified Mail, Return Receipt Requested:

Brown Family Trust 7960 W. Hidden Lake Drive Granite Bay, CA 95746	Sandra L. Manildi 1596 Lost River Road Lincoln, CA 95648	Robert Cornell 491 Baltusrol Drive Aptos, CA 95003
Lorraine Goodrich 662 Twelve Acres Drive Los Altos, CA 94022	Richard Jewel 7650 Kreth Road Fair Oaks, CA 95628	Patrick Kittle 761 Hatcher Drive Woodland, CA 95776
Lesa Lane P.O. Box 700 Corning, CA 96021	Russell Manson 13070 Texana Street San Diego, CA 92129	Mike O'Campo 112 Brightstone Circle Folsom, CA 95630
Susan Thomas 11631 Ivy Lane Moreno Valley, CA 92557	Kikuyo Nava 9493 White Horse Way Elk Grove, CA 95624	Vicki F. Paulus 906 Santa Dorotea Circle Rohnert Park, CA 95928

/s/ Maralee MacDonald  
Maralee MacDonald

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of June, 2008, a copy of this notice was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served on the following investors named as owners of the BER-E&B(2) Policy by U.S. Certified Mail, Return Receipt Requested:

John Lee Gregg, III  
904 Wiladonda  
La Canada, CA 91011

William J. Hughes  
1065 43rd Street  
Sacramento, CA 95819

Hannah Edwards  
63 Live Oak Drive  
Petaluma, CA 97952

Jock & Karenda Wilson  
PO Box 958  
New Castle, CA 95658

/s/ Maralee MacDonald

Maralee MacDonald

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of June, 2008, a copy of this motion was served on all interested parties through the Court's electronic filing system. In addition, a copy of this motion was served on the following investors named as owners of the FOW-S(1) Policy by U.S. Certified Mail, Return Receipt Requested:

Gross Family Trust 10914 LaPorte Road Challenge, CA 95925	Robert P. Carrasca and Sammie M. Carrasca 1873 Merrill Road Paradise, CA 95969	Terry M. Matheny and Carolyn Sue Matheny 5072 Foster Road Paradise, CA 95969
Stephen Bunge 3616 Fieldstone Drive West Buzeman, MT 59715	John D. Burge 567 E. 5th Avenue Chico, CA 95926	Trudy Bury 14 Sage Brush Court Chico, CA 95926
Alyse Trumbull (now Alyse Pendo) 23780 Malton Switch Orland, CA 95963	Wayne Carroll 18575 Farquhar Road Cottonwood, CA 96022	Julia Edsill 6 Westminster Court Chico, CA 95928
Craig Edwards 6483 Loyola Court Magalia, CA 95954	Sandra C. Glaziner 8665 Garstang Lane Los Molinos, CA 96055	Sharon A. Kemp 1270 Kling Court Paradise, CA 95969
Steve Julius 31562 Eagle Rock Way Lagune Beach, CA 92651	Fred M. and Sharon A. Kemp 1270 Kling Court Paradise, CA 95969	Ronald W. Lewis P.O. Box 7693 Chico, CA 95927
Eleonore L. Kimball 1939 Scott Avenue Corning, CA 96021	David W. Kirksey 3515 Jasmine Crest Encinitas, CA 92024	Danny L. Ruckman 3087 Pine Valley Road San Ramon, CA 94583
Mary Ann Martin 2105 Corby Avenue Santa Rosa, CA 95407	Terry M. Matheny 5072 Foster Road Paradise, CA 95969	Timothy G. Titus 6395 Shade Tree Paradise, CA 95969
Peter S. Mu 2122 Aguilar Court Milpitas, CA 95035	Lurline Ann Perrin 2825 Marguerite Avenue Corning, CA 96021	May Shen 1 Madrid Court Millbrae, CA 94030

/s/ Maralee MacDonald

Maralee MacDonald

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John E. Heinke Separate  
Property Trust  
5360 Clark Road  
Paradise, CA 95969

Steven R. Enochian  
and Barbara J. Enochian  
5455 Blackhawk Drive  
Danville, CA 94506-6004

Sebastian T. Purayidom  
and Mary S. Purayidom  
4454 Berryman Avenue  
Culver City, CA 90230

Larry and Marilyn Anderson  
6115 Christian Lane  
Eureka, CA 95503

Ray Banda  
14680 Aurelia Way  
San Leandro, CA 94578

Marc and Sherry A. Wilson  
753 Santiago Court  
Chico, CA 95973

Mark Damon Chips  
10815 Foothill Avenue  
Gilroy, CA 95020

Norlyn Wade  
23430 Deerfield Road  
Los Gatos, CA 95033

Gilman Goodrich  
662 Twelve Acres Drive  
Los Altos, CA 94022

James Oliver  
22 Stone Harbor  
Alameda, CA 94502

Dave Kirksey  
3515 Jasmine Crest  
Encinitas, CA 92024

Ben Mendoza  
6842 Kenfig Place SW  
Port Orchard, WA 98367

/s/ Maralee MacDonald  
Maralee MacDonald

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John Atkinson 8244 Woodyard Way Citrus Heights, CA 95621	Michael L. and Trudy Bury 14 Sage Brush Court Chico, CA 95926	Jill Catania 7034 Checkerbloom Way Citrus Heights, CA 95610
Estate of Carmen Palomo-Boyd c/o Monica Derner P. O. Box 364 Canby, CA 96015	Steven R. Enochian and Barbara J. Enochian 5455 Blackhawk Drive Danville, CA 94506-6004	Carol Lee Erwin (now Carol Banda) 14680 Aurelia Way San Leandro, CA 94578
Lonnie Julius 2046 Westwood Avenue Redding, CA 96001	Dave Kirksey 3515 Jasmine Crest Encinitas, CA 92024	Michael L. Pagan 7725 Tobia Way Fair Oaks, CA 95628
Ruth Collier P.O. Box 992684 Redding, CA 96099	Larry W Thomas 9280 Barbula Hill Road New Castle, CA 95658	Jack A. Wade 23430 Deerfield Drive Los Gatos, CA 95033

/s/ Maralee MacDonald  
Maralee MacDonald