

1 DAVID R. ZARO (BAR NO. 124334)
MICHAEL R. FARRELL (BAR NO. 173831)
2 LORAINÉ L. PEDOWITZ (BAR NO. 120614)
ALLEN MATKINS LECK GAMBLE
3 MALLORY & NATSIS LLP
515 South Figueroa Street, Ninth Floor
4 Los Angeles, California 90071-3309
Phone: (213) 622-5555
5 Fax: (213) 620-8816
E-Mail: dzaro@allenmatkins.com
6 mfarrell@allenmatkins.com
lpedowitz@allenmatkins.com

7 Attorneys for Receiver
8 THOMAS A. SEAMAN

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA
11 SOUTHERN DIVISION

12 SECURITIES AND EXCHANGE
COMMISSION,

13 Plaintiff,

14 v.

15 MEDICAL CAPITAL HOLDINGS,
16 INC.; MEDICAL CAPITAL
CORPORATION; MEDICAL
17 PROVIDER FUNDING
CORPORATION VI; SIDNEY M.
18 FIELD; and JOSEPH J.
LAMPARIELLO,

19 Defendants.
20

Case No. SA CV09-0818 DOC (RNBx)

DECLARATION OF THOMAS A.
SEAMAN IN SUPPORT OF
RECEIVER'S MOTION FOR ORDER:
1) SETTING CLAIMS BAR DATE; 2)
APPROVING PROOF OF CLAIM AND
CLAIM INFORMATION FORMS; AND
3) ESTABLISHING SUMMARY
PROCEDURES FOR CLAIM
ADMINISTRATION

Proposed Hearing Date

Date: January 31, 2011

Time: 8:30 a.m.

Ctrm: 9D

Judge: Hon. David O. Carter

22 **DECLARATION OF THOMAS A. SEAMAN**

23 I, THOMAS A. SEAMAN, declare as follows:

24 1. I am the Court-appointed permanent receiver for Medical Capital
25 Holdings, Inc., Medical Capital Corporation, and Medical Provider Funding
26 Corporation VI, and their subsidiaries and affiliates (collectively, the "Receivership
27 Entities"). I have personal knowledge of the facts set forth in this Declaration and,
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1 if called as a witness, could and would testify competently to such facts under oath.
2 I submit this declaration in support of the motion for order setting claims bar date,
3 approving claim forms, and establishing summary claims procedures ("Claims
4 Motion").

5 2. There are approximately 8000 noteholders. Based on my review and
6 accounting of the Receivership Entities, I believe that for the vast majority of
7 noteholders the records of the Receivership Entities are accurate with regard to the
8 amounts invested by noteholders and principal and interest paid out to noteholders.
9 Accordingly, providing noteholders with the information obtained from the records
10 and asking for confirmation will be a more efficient process for obtaining consensus
11 on claim information than simply soliciting information using blank forms. I
12 propose providing completed claim information to each noteholder in the form
13 attached as Exhibit A to the Claim Motion. The information obtained from
14 Exhibit A will then be used to calculate the allowed amount of each noteholder
15 claim, pursuant to further order of the Court.

16 3. However, because there are significantly fewer creditors than
17 noteholders, I propose soliciting claims from creditors using a blank form. This
18 places the burden on the creditor to submit a completed form with appropriate
19 documentation in order to participate in distributions. Given that there are only
20 about 300 known trade creditors, it will not be burdensome on my staff to review
21 and respond to the claims. The proposed form for creditors is attached to the Claim
22 Motion as Exhibit B.

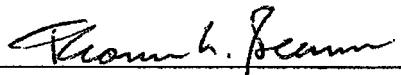
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4. Setting a bar date for filing claims and claim information forms that is 90 days from entry of an order on the Claims Motion will provide sufficient time to for my staff to prepare and send out forms and give all potential claimants at least 60 days notice of the bar date.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on December 21, 2010, at Irvine, California.



THOMAS A. SEAMAN