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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.
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Case No. SA CV09-0818 DOC (RNBx)

DECLARATION OF MICHAEL R.
FARRELL IN SUPPORT OF SEVENTH
INTERIM FEE APPLICATION OF
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP, COUNSEL
TO THE RECEIVER

Date: February 13, 2012
Time: 8:30 a.m.
Ctrm: 9D
Judge: Hon. David O. Carter

21 **DECLARATION OF MICHAEL R. FARRELL**

22 I, Michael R. Farrell, declare as follows:

23 1. I am a partner at the law firm of Allen Matkins Leck Gamble Mallory
24 & Natsis LLP ("Allen Matkins"), in Los Angeles, California. I am counsel for
25 Thomas Seaman who was appointed Permanent Receiver ("Receiver") pursuant to
26 the Order entered on August 17, 2009. I submit this declaration in support of Allen
27 Matkins' Seventh Interim Fee Application, filed concurrently herewith. I am the
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1 attorney primarily responsible for the supervision of this matter. I have personally
2 reviewed the billings in this case and, therefore, have personal knowledge of the
3 facts stated in this Declaration, which I could and would testify to if called upon to
4 do so.

5 2. Except as noted below, attached hereto as **Exhibit A** is a true and
6 correct copy of the billing invoices generated by Allen Matkins regarding its
7 representation of the Receiver from May 1, 2012 through July 31, 2012 ("Seventh
8 Application Period"). Due to confidentiality obligations and the sensitive nature of
9 the matters relating to Manatt Phelps & Phillips and Sedgwick, LLP, billing invoices
10 for those matters have not been included in this public document. Copies of such
11 invoices will be provided to the Court, in camera, immediately upon the Court's
12 request.

13 3. As to the work it performed during the Seventh Application Period,
14 Allen Matkins has written off and written down fees and costs as appropriate to
15 provide the best value to the receivership estate. By the Seventh Interim Fee
16 Application, Allen Matkins seeks approval of \$497,422.40 in fees and requests that
17 the Receiver be authorized to pay 80% of the requested fees, or \$397,937.92, at this
18 time.

19 4. Allen Matkins also seeks reimbursement of 100% of the allowed costs
20 totaling \$17,271.05 incurred during the Seventh Application Period.

21 5. With respect to the fees incurred for work involving the various
22 Medical Provider Funding Corporations ("MP"), to the extent tasks impacted
23 multiple entities or their assets, attorney time was split evenly between such entities.

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

3 Executed on January 13, 2012, at Los Angeles, California.

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5 /s/ Michael R. Farrell
6 Michael R. Farrell
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