

1 DAVID R. ZARO (BAR NO. 124334)
2 MICHAEL R. FARRELL (BAR NO. 173831)
3 EDWARD G. FATES (BAR NO. 227809)
4 ALLEN MATKINS LECK GAMBLE
5 MALLORY & NATSIS LLP
6 515 South Figueroa Street, Ninth Floor
7 Los Angeles, California 90071-3309
8 Phone: (213) 622-5555
9 Fax: (213) 620-8816
10 E-Mail: dzaro@allenmatkins.com
11 mfarrell@allenmatkins.com
12 tfates@allenmatkins.com

13 Attorneys for Receiver
14 THOMAS A. SEAMAN

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 SOUTHERN DIVISION

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 v.

22 MEDICAL CAPITAL HOLDINGS,
23 INC.; MEDICAL CAPITAL
24 CORPORATION; MEDICAL
25 PROVIDER FUNDING
26 CORPORATION VI; SIDNEY M.
27 FIELD; and JOSEPH J.
28 LAMPARIELLO,

Defendants.

Case No. SA CV09-0818 DOC (RNBx)

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

Date: September 12, 2011
Time: 8:30 a.m.
Ctrm: 9D
Judge: Hon. David O. Carter

DECLARATION OF MICHAEL R. FARRELL

I, Michael R. Farrell, declare as follows:

1. I am a partner at the law firm of Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), in Los Angeles, California. I am counsel for Thomas Seaman who was appointed Permanent Receiver ("Receiver") pursuant to the Order entered on August 17, 2009. I submit this declaration in support of Allen Matkins' Sixth Interim Fee Application, filed concurrently herewith. I am the

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 February 1, 2011 through April 30, 2011 ("Sixth
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. Furthermore,
11 certain entries regarding a potential stock sale have been redacted due to
12 confidentiality obligations. Copies of such invoices will be provided to the Court, in
13 camera, immediately upon the Court's request.

14 3. As to the work it performed during the Sixth Application Period, Allen
15 Matkins has written off and written down fees and costs as appropriate to provide
16 the best value to the receivership estate. By the Sixth Interim Fee Application,
17 Allen Matkins seeks approval of \$548,349.00 in fees and requests that the Receiver
18 be authorized to pay 80% of the remaining requested fees, or \$438,679.20, at this
19 time.

20 4. Allen Matkins also seeks reimbursement of 100% of the allowed costs
21 totaling \$11,084.46 incurred during the Sixth Application Period.

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

25 //

26 //

27 //

28

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 August 12, 2011, at Los Angeles, California.

4
5 /s/ Michael R. Farrell
6 Michael R. Farrell

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28