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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 SECOND
INTERIM FEE APPLICATION OF
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP, COUNSEL
TO THE RECEIVER

DATE: August 23, 2010
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' Second 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. Attached hereto as Exhibit A is a true and correct copy of the billing
6 invoices generated by Allen Matkins regarding its representation of the Receiver
7 from November 1, 2009 through April 30, 2010 ("Second Application Period").


8 3. As to the work it performed during the Second Application Period,
9 Allen Matkins has written off and written down fees and costs as appropriate to
10 provide the best value to the receivership estate. By the Second Interim Fee
11 Application, Allen Matkins seeks approval of \$1,303,884.50 in fees and requests
12 that the Receiver be authorized to pay 80% of the requested fees, or \$1,043,107.60
13 at this time, as to which \$25,000 in fees should be paid using funds provided to the
14 Receiver by Mail.com.

15 4. Allen Matkins also seeks reimbursement of \$32,620.33 in costs
16 incurred during the Second Application Period.

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

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

23 Executed on July 21, 2010, at Los Angeles, California.

24 
25 Michael R. Farrell