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8 Thomas A. Seaman

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

12 SECURITIES AND EXCHANGE
13 COMMISSION,

14 Plaintiff,

15 v.

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

20 Defendants.
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22

Case No. 8:09-cv-0818-DOC (RNBx)

RECEIVER'S EX PARTE
APPLICATION FOR A TWO-WEEK
EXTENSION OF TIME TO FILE
OBJECTIONS TO CLAIMS

1 Thomas A. Seaman, Receiver for Medical Capital Holdings, Inc., Medical
2 Capital Corporation, Medical Provider Funding Corporation VI, and their
3 subsidiaries and affiliates ("Receiver"), hereby applies for an additional two-week
4 extension of the deadline by which to file objections to claims ("Application").

5 On December 21, 2010, the Receiver filed his Motion for Order: (1) Setting
6 Claims Bar Date; (2) Approving Proof of Claim and Claim Information Forms; and
7 (3) Establishing Summary Procedures for Claim Administration ("Claim Procedures
8 Motion"). There was no opposition to the Claim Procedures Motion, and on
9 January 31, 2011, the Court entered the order granting the motion ("Claim
10 Procedures Order"). The Claim Procedures Order set the deadline to submit claims
11 as May 1, 2011 which deadline was subsequently extended by order of the Court to
12 June 15 ("Claims Bar Date").

13 The Claims Procedures Motion also contemplated that Receiver would filed
14 objections to claims within 120 days of the Claims Bar Date. With the bar date
15 extended to June 15, 2011, the 120-day objection period was set to end on
16 October 13, 2011. On October 7, 2011, the Receiver filed an ex parte application
17 seeking a 30-day extension of the time to object to claims due to a small number of
18 claims that required further analysis.

19 At that time, the Receiver predicted the additional work on claims would
20 require approximately three weeks, assuming that the latter part of that period could
21 be used for meeting and conferring with other parties, in particular soliciting the
22 input and position of the Securities and Exchange Commission ("SEC").
23 Unfortunately, the Receiver has just learned that the responsible attorney at the SEC
24 is out of town and unavailable for an extended period due to a death in the family.
25 Accordingly, the Receiver requests a further extension of the deadline to file claim
26 objections of two weeks to permit meaningful review and input by the SEC.

27 Prior to filing, the Receiver discussed this Application with counsel for the
28 SEC. Counsel for the SEC supported the request. The Receiver also e-mailed the

1 Application to counsel for Defendants Joseph Lampariello and Sidney Field. No
2 response was received from counsel for Defendants Joseph Lampariello and Sidney
3 Field.

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5 Dated: November 9, 2011

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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By: /s/ Michael R. Farrell

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MICHAEL R. FARRELL
Attorneys for Receiver
Thomas A. Seaman

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