

1 DAVID R. ZARO (BAR NO. 124334)
MICHAEL R. FARRELL (BAR NO. 173831)
2 EDWARD G. FATES (BAR NO. 227809)
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
tfates@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)

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

Date: May 19, 2014
Time: 8:30 a.m.
Ctrm: 9D
Judge: Hon. David O. Carter

1 Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"),
2 general counsel for Thomas A. Seaman ("Receiver"), the court-appointed Permanent
3 Receiver for Medical Capital Holdings, Inc., Medical Capital Corporation, Medical
4 Provider Funding Corporation VI, and their subsidiaries and affiliates (collectively,
5 the "Receivership Entities"), submits this Seventeenth Interim Application for
6 approval and payment of fees and reimbursement of expenses. This application
7 covers the period November 1, 2013 through January 31, 2014 ("Seventeenth
8 Interim Period").

9 Allen Matkins seeks interim approval of \$185,613.50 in fees and \$7,458.88 in
10 expenses incurred during the Seventeenth Interim Period. Allen Matkins asks that
11 the Receiver be authorized to pay 80% of the requested fees, or \$148,490.80, and
12 100% of the requested expenses. In light of the Court's prior comments, Allen
13 Matkins has carefully reviewed its invoices with an eye toward providing the best
14 possible value to the receivership estate and has made significant adjustments to
15 such invoices.

16 The Securities and Exchange Commission ("SEC") has reviewed this
17 Seventeenth Interim Fee Application, along with the Fee Application set for hearing
18 concurrently herewith filed by the Receiver. The SEC does not oppose this
19 Seventeenth Interim Fee Application.

20 **I. INTRODUCTION.**

21 On August 18, 2009, the Court entered the Preliminary Injunction and Order
22 Appointing a Permanent Receiver ("Appointment Order"), making the Receiver's
23 appointment permanent. Section VI of the Appointment Order empowers and
24 directs the Receiver to engage and employ attorneys to (1) assist in investigation and
25 discovery as may be necessary to locate and account for assets of or managed by the
26 Receivership Entities, and (2) investigate and, where appropriate, to institute,
27 pursue, and prosecute all claims and causes of action of whatever kind and nature as
28

1 a result of the activities of the employees or agents of the Receivership Entities. The
2 Receiver immediately engaged Allen Matkins to serve as his general counsel.

3 With the assistance of Allen Matkins, the Receiver has worked diligently and
4 effectively during the Seventeenth Interim Period to preserve and protect the
5 receivership estate, and maximize the value and recovery from the various
6 receivership assets.

7 The Receiver and his team have utilized numerous strategies to reduce the
8 amount of attorneys' fees incurred as the case proceeds, including the use of
9 additional junior attorneys and paralegals as appropriate. While the fees and costs
10 incurred by Allen Matkins during this Seventeenth Interim Period were significant,
11 the time and effort of Allen Matkins attorneys were necessary to preserve the
12 receivership estate (e.g. address a lawsuit against the Receiver relating to the Trace
13 nuclear facility in Texas) and maximize the recovery from receivership assets. By
14 this Fee Application, Allen Matkins respectfully requests to be compensated for the
15 services provided during the Seventeenth Interim Period.

16 **II. EXECUTIVE SUMMARY OF TASKS PERFORMED BY ALLEN**
17 **MATKINS DURING THE SEVENTEENTH INTERIM PERIOD.**

18 This case requires significant, complex legal work across a broad spectrum of
19 activities, including preserving assets, collecting debts, analyzing and pursuing
20 claims against third parties, negotiating and documenting complex transactions,
21 addressing environmental issues, and obtaining Court approval of various actions by
22 the Receiver. The following is an overview of Allen Matkins' work in significant
23 matters affecting the Receivership Estate during the Seventeenth Interim Period.
24 Further detail is contained within this Fee Application, as well as in the Receiver's
25 monthly reports to the Court. Allen Matkins provided crucial and continuous hands-
26 on assistance to the Receiver on numerous legal matters, including:

- 27 • **Claims/Third Party Recoveries:** Allen Matkins incurred significant
28 fees during the Seventeenth Interim Period assisting the Receiver in

1 obtaining, analyzing and reporting third party recovery information in
2 preparation for the Receiver's interim distribution. Allen Matkins had
3 extensive contact with noteholders and/or their counsel to address
4 issues relating to new or incorrect recovery and claim ownership
5 information. In particular, Allen Matkins had numerous
6 communications with class and mass counsel concerning information
7 they had provided on trustee settlement distributions, including issues
8 related to class ex parte proceedings. Allen Matkins assisted the
9 Receiver in updating claim information and calculations. The efforts of
10 Allen Matkins and the Receiver allowed the Receiver to make his
11 initial distribution of \$117,500,000.00 in February, 2014.

- 12 • **Interstate Restoration Litigation:** On May 2, 2013, Interstate
13 Restoration LLC filed an action against the Receiver in the Central
14 District, asserting various causes of action and seeking damages of over
15 \$900,000. The action involves the Receiver's sale of a loan made to
16 Trace Life Sciences, Inc. ("Trace") secured by Texas property,
17 including a radiochemical manufacturing facility, and restoration work
18 performed by the plaintiff at the property. During the Seventeenth
19 Interim Period, Allen Matkins provided extensive assistance to the
20 Receiver in preparing and filing a motion to dismiss plaintiff's amended
21 complaint, review and analysis of opposition papers, and preparation of
22 reply papers. Allen Matkins conducted a review of numerous
23 documents produced by Interstate. Allen Matkins drafted and
24 propounded written discovery to Interstate, engaged in various
25 discussions with opposing counsel on discovery issues, and began
26 preparing for depositions.
- 27 • **Lavipharm:** Allen Matkins assisted the Receiver in analyzing the
28 complex intellectual property collateral securing this substantial

1 defaulted loan to Lavipharm Laboratories, Inc. and Lavipharm
2 Corporation (collectively, "Lavipharm"), which has a current principal
3 balance owed of over \$24 million. The loan is secured by various
4 assets, including rights in certain patents for medical delivery systems
5 Allen Matkins worked with an expert concerning a valuation of the
6 borrower's IP assets. Allen Matkins conducted extensive negotiations
7 with a potential third party purchaser for the interest in Lavipharm,
8 including the exchange of numerous offers and counteroffers, analysis
9 re: handling of related contracts, Court approval strategies, preparation
10 of a non-disclosure agreement and review of numerous materials
11 relevant to the potential sale.

- 12 • **Reporting:** Allen Matkins assisted the Receiver in compiling the
13 information necessary to prepare and draft his 52nd, 53rd and
14 54th Interim Reports to the Court.

15 **III. FEE APPLICATION.**

16 With respect to its work performed during the Seventeenth Interim Period,
17 Allen Matkins requests approval of \$185,613.50 in fees and \$7,458.88 in expenses.
18 For ease of review, Allen Matkins has categorized the time billed by its
19 professionals as follows:

20 **A. Fees Requested (\$185,613.50)**

21 Allen Matkins seeks approval of \$185,613.50 in fees, which are categorized
22 in the table below.¹ Detailed descriptions of each category of fees and a break-down
23 of hours by professional are also included below.

CATEGORY	ALLEN MATKINS BILLING CODE	HOURS	FEES
Investigation / Reporting	298591-00004	9.5	\$5,014.50
Outstanding Litigation	298591-00007	1.0	\$535.00

27 ¹ In compliance with agreements reached with the Trustees, a separate billing
28 number was established for each of the MP entities. Typically, far fewer billing
categories would be used in such a receivership.

	CATEGORY	ALLEN MATKINS BILLING CODE	HOURS	FEEs
1				
2	Third Party Claims	298591-00008	53.9	\$25,140.00
3	Claims	298591-00009	53.6	\$26,394.00
4	Medical Provider Funding Corporation III.1 - Assets / Disposition	298591-00013	89.0	\$34,431.00
5	Medical Provider Funding Corporation III.2 - Assets / Disposition	298591-00014	0.6	\$237.00
6	The Perfect Game	298591-00021	13.2	\$7,489.00
7	Parkway/Dr. Aquino	298591-00022	1.6	\$584.00
8	Plan & Distribution	298591-00024	31.8	\$16,574.50
9	Manatt Phelps & Phillips Litigation	298591-00025	8.3	\$4,378.50
10	Interstate Restoration	298591-00029	173.9	\$63,314.00
11	Miscellaneous (General Receivership/Investor Issues)	298591-00002 298591-00005	2.8	\$1,522.00
12	TOTAL HOURS / FEES		439.2	\$185,613.50

I. Investigation / Reporting [298591-00004] (9.5 hours)

This category contains time spent investigating, analyzing and providing legal advice as to the operations, transactions and assets of the Receivership Entities and recovering documents, records and other information regarding the business and assets of the Receivership Entities. During the Seventeenth Interim Period, Allen Matkins assisted the Receiver with respect to gathering information for and preparing three monthly reports to the Court.

	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
20					
21	Michael R. Farrell	Partner Litigation	\$535	9.1	\$4,868.50
22					
23	Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	0.4	\$146.00
24	TOTAL HOURS & FEES²			9.5	\$5,014.50
25	TOTAL EXPENSES				\$158.35

² See Farrell Decl., Exh. A, pp. 6-8.

1 **2. Outstanding Litigation [298591-00007] (1 hours)**

2 This category contains time spent analyzing and defending the receivership
 3 estate's interest in outstanding litigation to which the Receivership Entities or their
 4 borrowers are parties. In each instance, Allen Matkins' focus was on preserving
 5 assets that were at risk in the litigation. In this period, Allen Matkins reviewed and
 6 analyzed materials relating to existing litigation.

NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
Michael R. Farrell	Partner Litigation	\$535	1.0	\$535.00
TOTAL HOURS & FEES³			1.0	\$535.00
TOTAL EXPENSES				\$51.25

12 **3. Third Party Claims [298591-00008] 53.9 hours)**

13 This category contains time spent analyzing and prosecuting claims on behalf
 14 of the receivership estate. Pending actions Allen Matkins assisted the Receiver with
 15 include the Receiver's claims against Pyramid Technologies, Inc. ("Pyramid"),
 16 Anthony Macaluso/ TEEM, LLC ("TEEM"), and Valley Health Care ("VHC").

17 The Receiver filed a case against Pyramid Technologies in which summary
 18 judgment in favor of the Receiver was granted, and the parties stipulated to dismiss
 19 the remaining claims in the complaint. The defendants filed a Notice of Appeal on
 20 January 6, 2012. One of the owners of Pyramid filed for bankruptcy and Allen
 21 Matkins provided advice to the Receiver concerning bankruptcy issues, including
 22 participation in a debtor's examination, and preparation of a complaint contesting
 23 the dischargeability of the debt. During the Seventeenth Interim Period, Allen
 24 Matkins handled various aspects of the adversary proceeding, including review and
 25 analysis of discovery requests, preparation of discovery responses, and review of

28 ³ See Farrell Decl., Exh. A, pp. 10-11.

1 documents and correspondence. Allen Matkins also prepared for and attended
2 multiple witness depositions.

3 As to the Receiver's claims against VHC, Allen Matkins advised the Receiver
4 regarding strategy for pending action, including potential summary judgment
5 motion.

6 In the Receiver's case against TEEM, Allen Matkins drafted and filed a
7 motion for entry of judgment. Allen Matkins also performed various research and
8 analysis re: collection issues and strategy.

9	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
10	David R. Zaro	Partner Bankruptcy/Creditors' Rights	\$560	5.5	\$3,080.00
11	Michael R. Farrell	Partner Litigation	\$535	0.7	\$374.50
12	Francis N. Scollan	Partner Litigation	\$485	31.6	\$15,326.00
13	Yale K. Kim	Partner Bankruptcy/Creditors' Rights	\$395	0.8	\$316.00
14	Joshua R. Mandell	Senior Counsel Bankruptcy/Creditors' Rights	\$395	15.3	\$6,043.50
15	TOTAL HOURS & FEES⁴			53.9	\$25,140.00
16	TOTAL EXPENSES				\$310.05

17
18
19
20 **4. Claims [298591-00009] (53.6 hours)**

21 Allen Matkins incurred significant fees during the Seventeenth Interim Period
22 assisting the Receiver in obtaining, analyzing and reporting third party recovery
23 information in preparation for the Receiver's interim distribution. Allen Matkins
24 had extensive contact with noteholders and/or their counsel to address issues
25 relating to new or incorrect recovery and claim ownership information. In
26 particular, Allen Matkins had numerous communications with class and mass
27 counsel concerning information they had provided on trustee settlement

28
4 See Farrell Decl., Exh. A, pp. 12-17.

1 distributions, including issues related to class ex parte proceedings. Allen Matkins
 2 assisted the Receiver in updating claim information and calculations. The efforts of
 3 Allen Matkins and the Receiver allowed the Receiver to make his initial distribution
 4 of \$117,500,000.00 in February, 2014.

5	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
6	David R. Zaro	Partner Bankruptcy/Creditors' Rights	\$560	0.5	\$280.00
7					
8	Michael R. Farrell	Partner Litigation	\$535	0.4	\$214.00
9					
10	Loraine L. Pedowitz	Senior Counsel Bankruptcy/Creditors' Rights	\$480	46.9	\$23,919.00
11	John T. Kaup	Paralegal Litigation	\$195	0.8	\$156.00
12	Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	5.0	\$1,825.00
13					
14	TOTAL HOURS & FEES⁵			53.6	\$26,394.00
15	TOTAL EXPENSES				\$192.20

16 **5. Medical Provider Funding Corporation III.1 – Assets /**
 17 **Disposition [298591-00013] (89 hours)**

18 This category contains time spent analyzing, investigating and preserving the
 19 assets of MPIII, Series 1. Allen Matkins assisted the Receiver in analyzing the
 20 complex intellectual property collateral securing this substantial defaulted loan to
 21 Lavipharm Laboratories, Inc. and Lavipharm Corporation (collectively,
 22 "Lavipharm"), which has a current principal balance owed of over \$24 million. The
 23 loan is secured by various assets, including rights in certain patents for medical
 24 delivery systems. Allen Matkins conducted extensive negotiations with a potential
 25 third party purchaser for the interest in Lavipharm, including the exchange of
 26 numerous offers and counteroffers, analysis re: handling of related contracts, Court
 27

28 ⁵ See Farrell Decl., Exh. A, pp. 18-28.

1 approval strategies, preparation of a non-disclosure agreement and review of
 2 numerous materials relevant to the potential sale.

3	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
4	David R. Zaro	Partner Bankruptcy/Creditors' Rights	\$560	11.7	\$6,552.00
5	Michael R. Farrell	Partner Litigation	\$535	1.5	\$802.50
6	Debra D. Hall	Partner Corporate & Securities	\$545	1.9	\$1,035.50
7	Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	0.4	\$146.00
8	Joshua Del Castillo	Senior Counsel Bankruptcy/Creditors' Rights/Litigation	\$355	65.6	\$23,288.00
9	Tim Hsu	Associate Litigation	\$295	7.9	\$2,607.00
10	TOTAL HOURS & FEES⁶			89.0	\$34,431.00
11	TOTAL EXPENSES				\$874.47

16 **6. Medical Provider Funding Corporation III.2 – Assets /**
 17 **Disposition [298591-00014] (0.6 hours)**

18 This category contains time spent analyzing, investigating and preserving the
 19 assets of MPIII, Series 2. During the Seventeenth Interim Period, Allen Matkins
 20 incurred worked on the filing and service of a stipulation and proposed order.

21	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
22	Andrea M. Schoor	Associate Bankruptcy/Creditors' Rights	\$395	0.6	\$237.00
23	TOTAL HOURS & FEES⁷			0.6	\$237.00
24	TOTAL EXPENSES				\$0

28 ⁶ See Farrell Decl., Exh. A, pp. 29-44.
⁷ See Farrell Decl., Exh. A, p. 45.

1 **7. The Perfect Game [298591-00021] (13.2 hours)**

2 The Perfect Game, LLC ("TPG") is a Nevada limited liability corporation
 3 whose primary asset is the rights to a film entitled *The Perfect Game*. The
 4 Receivership Entities own a percentage of TPG and control a majority of the voting
 5 shares of the entity.

6 During the Seventeenth Interim Period, Allen Matkins assisted the Receiver
 7 with issues relating to a sub-distribution agreement with a Mexican entity, including
 8 preparation of an agreement. Allen Matkins coordinated the negotiation of same
 9 with local Mexican counsel. Allen Matkins also advised the Receiver on the
 10 proposed abandonment of an ownership interest by an LLC member.

11	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
12	Thomas W. Henning	Partner	\$615	0.3	\$184.50
13		Tax			
14	Michael R. Farrell	Partner	\$535	3.2	\$1,712.00
15		Litigation			
16	Edward G. Fates	Senior Counsel	\$365	2.5	\$912.50
17		Bankruptcy/Creditors' Rights			
18	Daniel G. McIntosh	Partner	\$650	7.2	\$4,680.00
19		Corporate/Entertainment			
20	TOTAL HOURS & FEES⁸			13.2	\$7,489.00
21	TOTAL EXPENSES				\$0

22 **8. Parkway/Dr. Aquino [298591-00022] (1.6 hours)**

23 During the Seventeenth Interim Period, Allen Matkins assisted the Receiver
 24 with issues relating to the bankruptcy case of Parkway Acquisition, including
 25 communications with the Receiver's office, local counsel and counsel for the note
 26 buyer.

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 28 ⁸ See Farrell Decl., Exh. A, pp. 46-49.

NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	1.6	\$584.00
TOTAL HOURS & FEES⁹			1.6	\$584.00
TOTAL EXPENSES				\$0

9. Plan & Distribution [298591-00024] (31.8 hours)

During the Seventeenth Interim Period, Allen Matkins provided substantial advice and assistance concerning creditor Stratose as to distribution issues. Allen Matkins also corresponded with numerous noteholders and other interested parties concerning the timing and effect of the Receiver's forthcoming interim distribution. Allen Matkins also advised the Receiver on the potential effect of various third party recovery issues on the distribution. Allen Matkins also advised the Receiver as to addressing remaining impediments to making an interim distribution and resolution of same, including resolution of distribution calculation issues.

NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
David R. Zaro	Partner Bankruptcy/Creditors' Rights	\$560	4.9	\$2,744.00
Michael R. Farrell	Partner Litigation	\$535	23.6	\$12,626.00
Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	3.3	\$1,204.50
TOTAL HOURS & FEES¹⁰			31.8	\$16,574.50
TOTAL EXPENSES				\$322.52

10. Manatt Phelps & Phillips Claim [298591-00025] (8.3 hours)

This category includes time spent by Allen Matkins with respect to the Receiver's claims against former counsel for the Receivership Entities, the law firm of Manatt Phelps & Phillips. In the Seventeenth Interim Period, Allen Matkins

⁹ See Farrell Decl., Exh. A, pp. 40-51.
¹⁰ See Farrell Decl., Exh. A, pp. 52-61.

1 communicated with conflicts counsel as to document requests. Allen Matkins also
 2 researched and prepared correspondence to Manatt's counsel to address assertions
 3 concerning potential violation of arbitrators' order.

4	NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
5	Michael R. Farrell	Partner Litigation	\$550	6.9	\$3,795.00
6	Loraine L. Pedowitz	Senior Counsel Bankruptcy/Creditors' Rights	\$510	0.5	\$255.00
7	Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	0.9	\$328.50
8	TOTAL HOURS & FEES¹¹			8.3	\$4,378.50
9	TOTAL EXPENSES				\$214.95

12 **11. Interstate Restoration [298591-00029] (173.9 hours)**

13 On May 2, 2013, Interstate Restoration LLC filed an action against the
 14 Receiver in the Central District, asserting various causes of action and seeking
 15 damages of over \$900,000. The action involves the Receiver's sale of a loan made
 16 to Trace Life Sciences, Inc. ("Trace") secured by Texas property, including a
 17 radiochemical manufacturing facility, and restoration work performed by the
 18 plaintiff at the property. During the Seventeenth Interim Period, Allen Matkins
 19 provided extensive assistance to the Receiver in preparing and filing a motion to
 20 dismiss plaintiff's amended complaint, review and analysis of opposition papers, and
 21 preparation of reply papers. Allen Matkins conducted a review of numerous
 22 documents produced by Interstate. Allen Matkins drafted and propounded written
 23 discovery to Interstate, engaged in various discussions with opposing counsel on
 24 discovery issues, and began preparing for depositions.
 25

26
 27 ¹¹ Due to confidentiality obligations and the sensitive nature of the matters relating
 28 to this matter, billing invoices have not been included in this public document.
 Copies of such invoices will be provided to the Court, in camera, immediately
 upon the Court's request.

NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
Michael R. Farrell	Partner Litigation	\$535	44.4	\$23,754.00
Edward G. Fates	Senior Counsel Bankruptcy/Creditors' Rights	\$365	47.4	\$17,301.00
Rhonda Reid	Paralegal Litigation	\$310	1.6	\$496.00
Alana U. Thorbourne	Associate Litigation	\$310	0.7	\$217.00
Josi Swonetz	Associate Litigation	\$270	79.8	\$21,546.00
TOTAL HOURS & FEES¹²			173.9	\$63,314.00
TOTAL EXPENSES				\$748.14

12. Miscellaneous [298591-00002; 289521-00005] (2.8 hours)

This category includes fees and costs for General Receivership Issues. Specifically, time relating to the administration of the Receivership are included in this category, including but not limited to:

- General Receivership: Allen Matkins assisted the Receiver with addressing issues concerning a former receivership entity. Allen Matkins also communicated with Colorado regulators to address issues relating to the sentencing of a broker.

NAME	TITLE	RATE	TOTAL HOURS	TOTAL FEES
Michael R. Farrell	Partner Litigation	\$535	2.0	\$1,070.00
Joe M. Davidson	Partner Corporate	\$565	0.8	\$452.00
TOTAL HOURS & FEES¹³			2.8	\$1,522.00

¹² Due to confidentiality obligations and the sensitive nature of the matters relating to this matter, billing invoices have not been included in this public document. Copies of such invoices will be provided to the Court, in camera, immediately upon the Court's request.

¹³ See Farrell Decl., Exh. A, pp. 4-5; 9.

TOTAL EXPENSES	\$122.50
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B. Expenses Requested (\$7,458.88)

Allen Matkins also requests that the Court approve \$7,458.88 in expenses. A summary of the expenses by matter is contained in the charts above, and are consolidated for the Court's convenience below. Allen Matkins charges \$0.15 per page for copies and \$2.00 per page on outgoing faxes only. No charge for incoming faxes is included. Messenger fees include hand delivery charges and federal express or other overnight services. The urgency of many matters and the volume of interested parties to whom service of pleadings and other notices were required made overnight services the only practical alternative in many instances. In addition, certain of the pleadings were voluminous.

Copying charges and mail expenses likewise reflect the large volume of parties involved in certain matters, and the Receiver's goal to provide as much information as possible to interested parties. Travel expenses were incurred by Allen Matkins attorneys when their attendance was required at Court hearings and other litigation proceedings.

During the Seventeenth Interim Period, substantial expenses were incurred with respect to document productions in the Sedgwick matter.

CATEGORY	EXPENSES
Investigation / Reporting	\$158.35
Outstanding Litigation	\$51.25
Third Party Claims	\$310.05
Claims	\$192.20
Medical Provider Funding Corporation III.1 - Assets / Disposition	\$874.47
Plan & Distribution	\$322.52
Manatt Phelps & Phillips Litigation	\$214.95
Sedgwick, LLP Litigation	\$4,464.45
Interstate Restoration	\$748.14
Miscellaneous (General Receivership,	\$122.50

Investor Issues	
TOTAL EXPENSES:	\$7,458.88

IV. CONCLUSION.

Allen Matkins has worked diligently to assist the Receiver in fulfilling his assigned duties, and has provided valuable service to the Receivership estate during this Seventeenth Interim Period. Therefore, pursuant to the legal authorities cited in Allen Matkins' First Interim Fee Application, and this Court's power to approve the requested interim fees and expenses, Allen Matkins respectfully requests an order:

1. Approving and allowing fees totaling \$185,613.50 for the Seventeenth Interim Period;
2. Approving and allowing reimbursement of costs totaling \$7,458.88 for the Fifteenth Interim Period;
3. Authorizing the Receiver to pay 80% of the allowed amount of Allen Matkins' fees, which amount is \$148,490.80.
4. Authorizing the Receiver to pay 100% of the allowed amount of Allen Matkins' costs, which amount is \$7,458.88 and
5. For other and further relief as is appropriate.

Dated: April 21, 2014

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Michael R. Farrell
MICHAEL R. FARRELL
Attorneys for Receiver