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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  
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)

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

DATE: March 21, 2011  
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' Fourth Interim Fee Application, filed concurrently herewith. I am the  
28

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 August 1, 2010 through October 31, 2010 ("Fourth Application Period").  
8 Small portions of Exhibit A have been redacted to comply with the Receiver's  
9 confidentiality obligations.

10 3. As to the work it performed during the Fourth Application Period,  
11 Allen Matkins has written off and written down fees and costs as appropriate to  
12 provide the best value to the receivership estate. By the Fourth Interim Fee  
13 Application, Allen Matkins seeks approval of \$602,113.50 in fees and requests that  
14 the Receiver be authorized to pay \$67,855.50 relating to Mail.com Media  
15 Corporation (which amount has already been paid by the borrower to the Receiver),  
16 and 80% of the remaining requested fees, or \$427,406.40, at this time.

17 4. Allen Matkins also seeks reimbursement of \$9,847.11 in costs incurred  
18 during the Fourth Application Period.

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

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

25 Executed on February 18, 2011, at Los Angeles, California.

26  
27  
28

/s/ Michael R. Farrell  
Michael R. Farrell