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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.  
FIELD; and JOSEPH J.  
LAMPARIELLO,

19 Defendants.  
20

Case No. SA CV09-0818 DOC (RNBx)

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

DATE: June 13, 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. 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 November 1, 2010 through January 31, 2011  
8 ("Fifth Application Period"). Due to confidentiality obligations and the sensitive  
9 nature of the matters relating to Manatt Phelps & Phillips and Sedgwick, LLP,  
10 billing invoices for those matters have not been included in this public document.  
11 Copies of such invoices will be provided to the Court, in camera, immediately upon  
12 the Court's request.

13 3. As to the work it performed during the Fifth Application Period, Allen  
14 Matkins has written off and written down fees and costs as appropriate to provide  
15 the best value to the receivership estate. By the Fifth Interim Fee Application, Allen  
16 Matkins seeks approval of \$577,089.00 in fees and requests that the Receiver be  
17 authorized to pay 80% of the remaining requested fees, or \$461,671.20, at this time.

18 4. Allen Matkins also seeks reimbursement of 100% of the allowed costs  
19 totaling \$11,950.64 incurred during the Fifth Application Period.

20 5. With respect to the fees incurred for work involving the various  
21 Medical Provider Funding Corporations ("MP"), to the extent tasks impacted  
22 multiple entities or their assets, attorney time was split evenly between such 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 May 11, 2011, at Los Angeles, California.

26 

27 Michael R. Farrell