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

DATE: December 6, 2010  
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' Third 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 May 1, 2010 through July 31, 2010 ("Third Application Period").

8 3. As to the work it performed during the Third Application Period, Allen  
9 Matkins has written off and written down fees and costs as appropriate to provide  
10 the best value to the receivership estate. By the Third Interim Fee Application,  
11 Allen Matkins seeks approval of \$563,951.50 in fees and requests that the Receiver  
12 be authorized to pay \$38,558.50 relating to Mail.com Media Corporation (which  
13 amount has already been paid by the borrower to the Receiver), 80% of the  
14 remaining requested fees, or \$420,314.40, at this time.

15 4. Allen Matkins also seeks reimbursement of \$17,326.64 in costs  
16 incurred during the Third 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 November 5, 2010, at Los Angeles, California.

24   
25 Michael R. Farrell