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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