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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)

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

Date: May 7, 2012
Time: 8:30 a.m.
Ctrm: 9D
Judge: Hon. David O. Carter

21 I, Michael R. Farrell, declare as follows:

22 1. I am a partner at the law firm of Allen Matkins Leck Gamble Mallory
23 & Natsis LLP ("Allen Matkins"), in Los Angeles, California. I am counsel for
24 Thomas Seaman who was appointed Permanent Receiver ("Receiver") pursuant to
25 the Order entered on August 17, 2009. I submit this declaration in support of Allen
26 Matkins' Eighth Interim Fee Application, filed concurrently herewith. I am the
27 attorney primarily responsible for the supervision of this matter. I have personally
28

1 reviewed the billings in this case and, therefore, have personal knowledge of the
2 facts stated in this Declaration, which I could and would testify to if called upon to
3 do so.

4 2. Except as noted below, attached hereto as **Exhibit A** is a true and
5 correct copy of the billing invoices generated by Allen Matkins regarding its
6 representation of the Receiver from August 1, 2011 through October 31, 2011
7 ("Eighth Application Period"). Due to confidentiality obligations and the sensitive
8 nature of the matters relating to Manatt Phelps & Phillips and Sedgwick, LLP,
9 billing invoices for those matters have not been included in this public document.
10 Copies of such invoices will be provided to the Court, in camera, immediately upon
11 the Court's request.

12 3. As to the work it performed during the Eighth Application Period,
13 Allen Matkins has written off and written down fees and costs as appropriate to
14 provide the best value to the receivership estate. By the Eight Interim Fee
15 Application, Allen Matkins seeks approval of \$492,994.05 in fees and requests that
16 the Receiver be authorized to pay 80% of the requested fees, or \$394,395.24, at this
17 time.

18 4. Allen Matkins also seeks reimbursement of 100% of the allowed costs
19 totaling \$8,133.47 incurred during the Eighth Application Period.

20 5. With respect to the fees incurred for work involving the various
21 Medical Provider Funding Corporations, to the extent tasks impacted multiple
22 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 March 21, 2012, at Los Angeles, California.

26 
27 _____
28 Michael R. Farrell