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 14 UNITED STATES DISTRICT COURT
 15 CENTRAL DISTRICT OF CALIFORNIA
 16 SOUTHERN DIVISION

17 SECURITIES AND EXCHANGE
 18 COMMISSION,

19 Plaintiff,

20 v.

21 MEDICAL CAPITAL HOLDINGS,
 INC.; MEDICAL CAPITAL
 CORPORATION; MEDICAL
 22 PROVIDER FUNDING
 CORPORATION VI; SIDNEY M.
 23 FIELD; and JOSEPH J.
 LAMPARIELLO,

24 Defendants.

Case No. 8:09-cv-0818-DOC (RNBx)

EX PARTE APPLICATION FOR
 ORDER AMENDING RECEIVER'S
 MOTION TO APPROVE SALE OF
 LOANS MADE TO INTEGRATED
 HEALTHCARE HOLDINGS, INC.

Ctrm: 9D
 Judge: Hon. David O. Carter

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3 Thomas A. Seaman ("Receiver"), Court-appointed permanent receiver for
4 Medical Capital Holdings, Inc. ("MCH"), Medical Capital Corporation ("MCC"),
5 Medical Provider Funding Corporation VI ("MP VI"), and their subsidiaries and
6 affiliates, including Medical Provider Funding Corporations I through V
7 (collectively, the "Receivership Entities"), applies for an order amending his motion
8 for approval of the sale of loans made to Integrated Healthcare Holdings, Inc. ("Sale
9 Motion") to KPC Resolution Company, LLC ("Purchaser").

10 On February 4, 2010, the Receiver filed his Sale Motion and ex parte
11 application for approval of proposed overbid procedures and notice of sale ("First
12 Ex Parte Application"). The Sale Motion was originally set for hearing on
13 March 22, 2010. The overbid procedures include a requirement that overbids be
14 received by the Receiver no later than March 17, 2010, three business days before
15 the original hearing date.

16 On March 16, 2010, the Court entered a minute order rescheduling the
17 hearing on the Sale Motion from March 22 to April 2, 2010 (Docket #184). On
18 March 17, 2010, the Receiver filed an ex parte application requesting that the
19 deadline to submit overbids be extended to March 30, 2010, three business days
20 before the new sale hearing ("Second Ex Parte Application").

21 The Receiver's Second Ex Parte Application also explained that the Sale
22 Motion needed to be amended due to the hearing date change. The Sale Motion
23 stated that the sale must close on the earlier of (a) a date agreed upon by the
24 Purchaser or the high bidder approved by the Court, and (b) March 31, 2010. The
25 Receiver discussed this issue with Purchaser, and it was verbally agreed that the
26 deadline to close the sale would be extended to reflect a similar time period as
27 previously existed. The Receiver, in an effort to avoid the need for future
28 applications in the event of unforeseen delays, determined that the closing deadline
should be linked to the entry of an approval order rather than a fixed date. The
Receiver estimated that a closing deadline of the fifth business day after entry of an

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3 order approving the sale was appropriate and requested that the Court amend the
4 Sale Motion accordingly. The Court granted the Second Ex Parte Application on
5 the same day it was filed – March 17, 2010.

6 Subsequently, Purchaser and Receiver agreed that the deadline to close the
7 sale should be adjusted to seven business days following entry of the order to more
8 closely match the original schedule in the Loan Purchase and Sale Agreement
9 ("Agreement"), which contemplated a closing seven business days from the hearing
10 date (i.e. March 22 to March 31). Subject to Court approval, the parties executed
11 the First Amendment ("First Amendment") to the Agreement, a copy of which is
12 attached to the Supplemental Declaration of Thomas Seaman in Support of the Sale
13 Motion (filed herewith). The First Amendment addresses the closing deadline issue,
14 as well as a non-substantive paragraph numbering correction. Accordingly, the
15 Receiver requests that (a) the deadline to close provided in the Sale Motion be
16 amended to be seven business days from entry of an order approving the sale, and
17 (b) the Sale Motion be amended to seek approval of the Agreement as amended by
18 the First Amendment.

19 Pursuant to Local Rule 7-19.1, the Receiver circulated this application to
20 counsel for the Securities and Exchange Commission ("Commission") and
21 Defendants Field and Lampariello before filing. The Receiver was informed by
22 counsel that the Commission has no opposition, and that defendants Field and
23 Lampariello continue to oppose the Sale Motion, but have no separate opposition to
24 this application.
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This application has been provided to all known potential overbidders and posted on the Receiver's website.

Dated: March 24, 2010

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Ted Fates

TED FATES
Attorneys for Receiver
Thomas A. Seaman