	DAVID R. ZARO (BAR NO. 124334) JOSHUA A. DEL CASTILLO (BAR NO MELISSA K. ZONNE (BAR NO. 30158) ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP 865 South Figueroa Street, Suite 2800 Los Angeles, California 90017-2543 Phone: (213) 622-5555 Fax: (213) 620-8816 E-Mail: dzaro@allenmatkins.com jdelcastillo@allenmatkins.com Mattorneys for Receiver STEPHEN J. DONELL	. 239015)
9	UNITED STATES	DISTRICT COURT
10	CENTRAL DISTRICT OF CALIFORNIA	
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12	SECURITIES AND EXCHANGE	Case No. 5:15-CV-02387-SVW (KKx)
13	COMMISSION,	DECLARATION OF RECEIVER,
14	Plaintiff,	STEPHEN J. DONELL, IN SUPPORT OF THIRD INTERIM APPLICATIONS FOR PAYMENT OF FEES AND
15	v.	REIMBURSEMENT OF EXPENSES OF (1) RECEIVER, STEPHEN J. DONELL; AND (2) RECEIVER'S COUNSEL,
16 17		ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP
17	ROBERT YANG; et al.,	[Notice of Applications for Payment of
19		Fees and Reimbursement of Expenses:
20	Defendants.	Third Interim Application of Allen Matkins; Third Interim Application of Receiver; Memorandum of Points and
21	and	Authorities; and [Proposed] Order submitted concurrently herewith]
22		Date: February 27, 2017 Time: 1:30 p.m.
23	YANROB'S MEDICAL, INC.; et al.,	Time: 1:30 p.m. Ctrm: 10A Judge: Hon. Stephen V. Wilson
24	Relief Defendants.	
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LAW OFFICES Allen Matkins Leck Gamble Mallory & Natsis LLP		Case No. 5:15-CV-02387-SVW (KKx) DECLARATION OF STEPHEN DONELL IN SUPPORT OF FEE APPLICATIONS

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DECLARATION OF STEPHEN J. DONELL

I, Stephen J. Donell, declare as follows:

3 I am the receiver appointed by this Court for Defendants Suncor 1. Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their 4 respective subsidiaries and affiliates (collectively, the "Receivership Entities" or 5 "Entities"). I make this Declaration in support of the concurrently filed applications 6 for payment of fees and reimbursement of expenses (the "Applications") of myself, 7 8 and Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), my counsel of record. I have personal knowledge of the facts set forth herein and, if 9 called to testify, could testify competently thereto. 10

As reflected in my Initial Report of Receiver (Dkt. No. 20), in my First
 Quarterly Status Report (Dkt. No. 53), and in my Second Quarterly Status Report
 (Dkt No. 129), since my appointment as Receiver I have, among many other things:

Continued to administer the estates of the Receivership Entities
(collectively, the "Estate"), funded via approximately \$2.4 million in
cash recoveries;

Confirmed the amount and location of nearly \$3 million in cash assets potentially available for recovery and subject to turn-over requirements of the Appointment Order, in the form of approximately \$2.5 million in cash deposits (\$2.4 million of which have been turned over, with further proceedings pending as to \$2 million of this total) and \$250,000 in investor funds paid to the Metropolitan Water District of Southern California in the pre-receivership period;

• Secured the turn-over of \$2 million of the above-referenced cash deposits from Celtic Bank Corporation ("Celtic Bank"), which funds the Receiver is holding in a separate account pending a Court determination regarding competing claims to these funds;

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1	• Continued to develop and undertake a marketing and disposition plan		
2	in connection with each of the real properties implicated in this matter,		
3	including via the engagement of real property brokers and the		
4	commencement of marketing efforts for all saleable properties		
5	• Coordinated with Celtic Bank and with GBC International Bank ("GBC		
6	Bank") regarding the abandonment of two of the real properties		
7	implicated in this matter;		
8	• Identified two real properties determined to be "underwater," and		
9	subject to immediate abandonment, and prepared and filed a motion for		
10	authority to complete an abandonment of those properties, ultimately		
11	resulting in the Court-approved abandonment of these properties during		
12	Application Period;		
13	• Identified a pre-receivership purchase and sale agreement ("PSA") for		
14	another real property which the Receiver determined should be		
15	abandoned, ultimately resulting in Court approval of the PSA's		
16	abandonment;		
17	• Prepared and submitted my Second Quarterly Status Report;		
18	• Continued to monitor and participate in all pending state court litigation		
19	matters affecting or relating to the Receivership Entities, and		
20	maintained the status quo in such matters; and		
21	• Communicated with investors (and counsel for investors) in the		
22	Receivership Entities regarding the status of the receivership, issues		
23	relating to investor immigration petitions, and registration via the		
24	Receiver's website.		
25	3. I have reviewed the Applications, and I believe the fee and expense		
26	requests therein to be fair and reasonable, and an accurate representation of the work		
27	performed for the benefit of the Receivership Entities. I have likewise determined		
28	that the Estate has actually benefited from the services rendered.		
Gamble LLP	Case No. 5:15-CV-02387-SVW (KKx) DECLARATION OF STEPHEN DONELL IN		
	1064059.02/LA -3- SUPPORT OF FEE APPLICATIONS		

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4. True and correct copies of all of my firm's invoices for services
 rendered from July 1, 2016 through September 30, 2016 (the "Application Period"),
 are attached hereto as <u>Exhibit A</u>. In my business judgment, I believe the hourly
 rates that I and my internal professionals charged were appropriate, given the
 requirements of the receivership, that every effort was made to have tasks completed
 at the lowest possible billing rate, and that the total fees and expenses for which
 approval and payment are sought are fair and reasonable.

5. 8 In accordance with the Security and Exchange Commission's billing procedures, I have prepared a Standardized Final Accounting Report for the 9 10 Application Period, a true and correct copy of which is attached hereto as **Exhibit B**. As of this date, I presently hold approximately \$2 million for the 11 6. benefit of the Receivership Entities, not including the funds turned over by Celtic 12 13 Bank, which I am holding separately, pending an adjudication of the parties rights in those funds. 14

15 I declare under penalty of perjury under the laws of the State of California16 that the foregoing is true and correct.

Executed on January 11, 2017, at Los Angeles, California.

Etere Donell

Stephen J. Donell

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