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15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA

17 SECURITIES AND EXCHANGE  
18 COMMISSION,

19 Plaintiff,

20 v.

21 ROBERT YANG, et al.,

22 Defendants,

23 YANROB'S MEDICAL, INC., et al.,

24 Relief Defendants.

Case No. 5:15-CV-02387-SVW (KKx)

**STIPULATION TO EXTEND TIME  
FOR FILING OF RECEIVER'S AND  
RECEIVER'S PROFESSIONALS'  
FIRST INTERIM APPLICATIONS  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES**

[Proposed] Order submitted concurrently  
herewith

Ctrm: 6  
Judge: Hon. Stephen V. Wilson

**STIPULATION**

25 The following Stipulation to Extend Time for Filing of Receiver's and  
26 Receiver's Professionals' First Interim Applications for Payment of Fees and  
27 Reimbursement of Expenses (the "Stipulation") is made by and between Stephen J.  
28 Donell (the "Receiver"), the Court-appointed receiver in the above-entitled action;  
Plaintiff Securities and Exchange Commission (the "Commission"); and Defendants  
Robert Yang and Claudia Kano, by and through their respective counsel of record,  
and with respect to the following facts:

1           A.     The Receiver was appointed, in his permanent capacity, on December  
2 11, 2015, pursuant to this Court's Preliminary Injunction and Order Appointing  
3 Receiver, Freezing Assets, and Providing for Other Ancillary Relief (the  
4 "Appointment Order") (Dkt. No. 18);

5           B.     The Appointment Order provides that the Receiver and his  
6 professionals are to submit applications for payment of fees and reimbursement of  
7 expenses ("Fee Applications") on a quarterly basis;

8           C.     The Appointment Order further provides that Fee Applications should  
9 be filed with the Court within 45 days of the end of each calendar quarter, with  
10 materials in support of Fee Applications provided to the Commission for review a  
11 minimum of 30 days prior to the filing of any Fee Applications;

12           D.     The Receiver, his forensic accountant, and his counsel of record have  
13 provided the Commission with copies of invoices reflecting services performed, and  
14 fees and costs incurred, for the period from the Receiver's appointment through  
15 March 31, 2016;

16           E.     The scope of the work performed by the Receiver and his professionals  
17 during the period from the Receiver's appointment through March 31, 2016 was  
18 substantial, and the supporting papers submitted to the Commission are,  
19 accordingly, detailed and voluminous;

20           F.     The parties have agreed that the Commission should be entitled to  
21 additional time to review the supporting materials provided in order to evaluate and  
22 comment upon the fees and costs incurred by the Receiver and his professionals  
23 before their respective First Interim Fee Applications are filed with the Court; and

24           G.     Consequently, the time to file the Receiver's and his professionals' First  
25 Interim Fee Applications should be extended to June 3, 2016.

26  
27  
28

**STIPULATION AND AGREEMENT**

Accordingly, and in consideration of the foregoing, the Receiver, the Commission, and Defendants Yang and Kano STIPULATE and AGREE as follows:

1. The time for the Receiver and his professionals' to file their respective First Interim Fee Applications shall be extended to June 3, 2016; and

2. All Fee Applications submitted after the Receiver's and his professionals' forthcoming First Interim Fee Applications shall be filed in accordance with the requirements of the Appointment Order unless otherwise agreed by the parties and approved by this Court.

Dated: May 20, 2016

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP  
DAVID R. ZARO  
JOSHUA A. DEL CASTILLO  
KENYON HARBISON

By: /s/ Joshua A. del Castillo  
JOSHUA A. DEL CASTILLO  
Attorneys for Receiver  
STEPHEN J. DONELL

Dated: May 20, 2016

SECURITIES AND EXCHANGE  
COMMISSION  
ZACHARY T. CARLYLE

By: /s/ Zachary T. Carlyle  
ZACHARY T. CARLYLE  
Attorneys for Plaintiff  
SECURITIES AND EXCHANGE  
COMMISSION

Dated: May 20, 2016

MITCHELL SILBERBERG  
& KNUPP LLP  
MARK T. HIRAIDE

By: /s/ Mark T. Hiraide  
MARK T. HIRAIDE  
Attorneys for Defendants  
ROBERT YANG and CLAUDIA  
KANO

# **PROPOSED ORDER**

**Proposed Order**

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

ROBERT YANG, et al.,

Defendants,

YANROB'S MEDICAL, INC., et al.,

Relief Defendants.

Case No. 5:15-CV-02387-SVW (KKx)

**[PROPOSED] ORDER GRANTING  
STIPULATION TO EXTEND TIME  
FOR FILING OF RECEIVER'S AND  
RECEIVER'S PROFESSIONALS'  
FIRST INTERIM APPLICATIONS  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES**

Ctrlm: 6  
Judge: Hon. Stephen V. Wilson

**ORDER ON STIPULATION**

The Court has reviewed and considered the Stipulation to Extend Time for Filing of Receiver's and Receiver's Professionals' First Interim Applications for Payment of Fees and Reimbursement of Expenses (the "Stipulation") entered into by and between the Court-appointed receiver in the above-entitled action (the "Receiver"); the Plaintiff Securities and Exchange Commission; and Defendants Robert Yang and Claudia Kano (collectively, the "Parties"). Good cause appearing therefor, the Court GRANTS the Stipulation and ORDERS as follows:

**[PROPOSED] ORDER GRANTING  
STIPULATION TO EXTEND TIME TO FILE  
FEE APPLICATIONS**

1           1.     The time for the Receiver and his professionals' to file their respective  
2 first interim applications for payment of fees and reimbursement of expenses (the  
3 "Fee Applications") shall be extended to June 3, 2016; and

4           2.     All Fee Applications submitted after the Receiver's and his  
5 professionals' forthcoming First Interim Fee Applications shall be filed in  
6 accordance with the requirements of the Court's December 11, 2015 Preliminary  
7 Injunction and Order Appointing Receiver, Freezing Assets, and Providing for Other  
8 Ancillary Relief, unless otherwise agreed by the Parties and approved by this Court.

9  
10 Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Stephen V. Wilson  
Judge, United States District Court

**PROOF OF SERVICE**

*Securities and Exchange Commission v. Robert Yang, Suncor Fontana, et al.*  
 USDC, Central District of California – Case No. 5:15-cv-02387-SVW (KKx)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 515 S. Figueroa Street, 9th Floor, Los Angeles, California 90071-3398.

A true and correct copy of the foregoing document(s) described below will be served in the manner indicated below:

**STIPULATION TO EXTEND TIME FOR FILING OF RECEIVER'S  
 AND RECEIVER'S PROFESSIONALS' FIRST INTERIM  
 APPLICATIONS FOR PAYMENTS OF FEES AND  
 REIMBURSEMENT OF EXPENSES**

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")** – the above-described document will be served by the Court via NEF. On **May 20, 2016**, I reviewed the CM/ECF Mailing Info For A Case for this case and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

- **Zachary T. Carlyle**  
 carlylez@sec.gov,kasperg@sec.gov,karpeli@sec.gov,  
 blomgrene@sec.gov,pinkstonm@sec.gov,NesvigN@sec.gov
- **Stephen J. Donell**  
 jdelcastillo@allenmatkins.com
- **Mark T. Hiraide**  
 mhiraide@hiraidelaw.com,kju@phlcorplaw.com,  
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- **George D. Straggas**  
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- **David J. Van Havermaat**  
 vanhavermaatd@sec.gov,larofiling@sec.gov,berryj@sec.vog,  
 irwinma@sec.gov

- **Joshua Andrew del Castillo**  
jdelcastillo@allenmatkins.com

2. **SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):** On \_\_\_\_\_, I served the following person(s) and/or entity(ies) in this case by placing a true and correct copy thereof in a sealed envelope(s) addressed as indicated below. I am readily familiar with this firm's practice of collection and processing correspondence for mailing. Under that practice it is deposited with the U.S. postal service on that same day in the ordinary course of business. I am aware that on motion for party served, service is presumed invalid if postal cancellation date or postage meter date is more than 1 (one) day after date of deposit for mailing in affidavit.

I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on **May 20, 2016** at Los Angeles, California.

*s/ Martha Díaz*  
\_\_\_\_\_  
Martha Diaz