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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 SECURITIES AND EXCHANGE
14 COMMISSION,
Plaintiff,

15 vs.

16 ROBERT YANG,
17 CLAUDIA KANO,
18 SUNCOR FONTANA, LLC,
19 SUNCOR HESPERIA, LLC, AND
SUNCOR CARE LYNWOOD, LLC
20 Defendants,

21 AND

22 YANROB'S MEDICAL, INC.,
23 HEALTHPRO CAPITAL PARTNERS, LLC,
24 AND SUNCOR CARE, INC.
Relief Defendants.

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

**STIPULATION TO ENTRY OF
JUDGMENTS AS TO DEFENDANTS
SUNCOR FONTANA, LLC, SUNCOR
HESPERIA, LLC, AND SUNCOR
CARE LYNWOOD, LLC**

1 Plaintiff Securities and Exchange Commission (“SEC”) and Defendants Suncor
2 Fontana, LLC, Suncor Hesperia, LLC, and Suncor Care Lynwood, LLC (collectively
3 the “Receivership Entity Defendants”) hereby respectfully submit this Stipulation to
4 entry of the attached Judgments against the Receivership Entity Defendants.

5 The Receivership Entity Defendants have consented to the entry of Judgments
6 that resolve all injunctive relief sought by the SEC against the Receivership Entity
7 Defendants by permanently enjoining them from violating Section 17(a) of the
8 Securities Act of 1933, Section 10(b) of the Securities Exchange Act of 1934, and
9 Rule 10b-5 thereunder. The Receivership Entity Defendants’ consents and proposed
10 Judgments are attached as Exhibits 1-6 to this Stipulation.

11 The proposed Judgments additionally order that, upon motion by the
12 Commission, the Court shall order the Receivership Entity Defendants to pay
13 disgorgement of ill-gotten gains and prejudgment interest thereon, with the amounts
14 of disgorgement and civil penalty to be determined by the Court.

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1 WHEREFORE, the SEC and Receivership Entity Defendants respectfully
2 request that the Court enter the attached proposed Judgments.

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4 Dated: May 26, 2016

Respectfully submitted,

5 /s/ Zachary T. Carlyle

Zachary T. Carlyle, Admitted *pro hac vice*

6 Leslie J. Hughes, Admitted *pro hac vice*

7 U.S. Securities and Exchange Commission

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Attorneys for Plaintiff

10 *Securities and Exchange Commission*

11 /s/ David R. Zaro

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18 *Attorneys for Receiver Stephen J. Donell, and*

19 *Receivership Defendants Suncor Fontana, LLC,*

20 *Suncor Hesperia, LLC, Suncor Care Lynwood, LLC.*

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION
1961 Stout Street, Suite 1700, Denver, Colorado 80294-1961
Telephone No. (303) 844-1000; Facsimile No. (303) 297-3529

On May 27, 2016, I caused to be served the document entitled **STIPULATION TO ENTRY OF JUDGMENTS AS TO DEFENDANTS SUNCOR FONTANA, LLC, SUNCOR HESPERIA, LLC, AND SUNCOR CARE LYNWOOD, LLC** on all the parties to this action addressed as stated on the attached service list:

OFFICE MAIL: By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency’s practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

PERSONAL DEPOSIT IN MAIL: By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

EXPRESS U.S. MAIL: Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

HAND DELIVERY: I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

UNITED PARCEL SERVICE: By placing in sealed envelope(s) designated by United Parcel Service (“UPS”) with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

ELECTRONIC MAIL: By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

E-FILING: By causing the document to be electronically filed via the Court’s CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

FAX: By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: May 27, 2016

/s/ Leslie J. Hughes
Leslie J. Hughes

