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13 Attorneys for Receiver  
 14 STEPHEN J. DONELL

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)

**NOTICE OF SUBMISSION AND  
 MOTION FOR APPROVAL OF  
 FIRST INTERIM APPLICATIONS  
 FOR PAYMENT OF FEES AND  
 REIMBURSEMENT OF EXPENSES  
 OF (1) RECEIVER, STEPHEN J.  
 DONELL; (2) FORENSIC  
 ACCOUNTANT, BRANDLIN &  
 ASSOCIATES; AND (3) RECEIVER'S  
 COUNSEL, ALLEN MATKINS LECK  
 GAMBLE MALLORY & NATSIS  
 LLP**

[Memorandum of Points and Authorities;  
 First Interim Application of Receiver and  
 Forensic Accountant; First Interim  
 Application of Allen Matkins;  
 Declaration of Stephen J. Donell; and  
 [Proposed] Order submitted concurrently  
 herewith]

Date: July 11, 2016  
 Time: 1:30 p.m.  
 Ctrm: 6  
 Judge: Hon. Stephen V. Wilson

1 TO ALL INTERESTED PARTIES AND THIS HONORABLE COURT:  
 2 PLEASE TAKE NOTICE THAT on July 11, 2016, at 1:30 p.m., or as soon  
 3 thereafter as this matter may be heard in Courtroom 6 of the above-entitled Court,  
 4 located at 312 North Spring Street, Los Angeles, California 90012, Stephen  
 5 J. Donell, (the "Receiver") as the permanent receiver for Defendants Suncor  
 6 Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their  
 7 respective subsidiaries and affiliates, will and hereby does move this Court for an  
 8 Order granting the First Interim Applications for Payment of Fees and  
 9 Reimbursement of Expenses (the "Applications") of the Receiver, his forensic  
 10 accountant, Brandlin & Associates ("Brandlin"), and his counsel of record, Allen  
 11 Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins").

12 The Applications of the Receiver, Brandlin<sup>1</sup>, and Allen Matkins have been  
 13 submitted concurrently herewith. Pursuant to the Applications, the Receiver,  
 14 Brandlin, and Allen Matkins seek approval of all of their respective fees and  
 15 expenses incurred from December 11, 2015 through March 31, 2016, and payment,  
 16 on an interim basis, of a portion of those fees and expenses, as follows:

| <u>Applicant</u>     | <u>Current Fees Requested</u> | <u>Current Expenses Requested</u> | <u>Total Amount Currently Requested</u> |
|----------------------|-------------------------------|-----------------------------------|---|
| Receiver/Brandlin    | \$233,656.92                  | \$1,800.96                        | \$235,457.88                            |
| Allen Matkins        | \$191,697.12                  | \$9,648.33                        | \$201,345.45                            |
| <b><u>TOTAL:</u></b> | \$425,354.04                  | \$11,449.29                       | \$436,803.33                            |

22 The Applications are based on this Notice of Submission and Motion for  
 23 Approval of First Interim Applications for Payment of Fees and Reimbursement of  
 24 Expenses, as well as the concurrently filed Memorandum of Points and Authorities,  
 25 and Declaration of Stephen J. Donell, along with any argument or evidence

28 <sup>1</sup> Because Brandlin billed for its services directly through the Receiver, the Receiver's and Brandlin's Applications are submitted as a single document.

1 presented to the Court at the hearing on this Motion.

2

3 Dated: June 3, 2016

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

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By:           /s/          Joshua A. del Castillo

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JOSHUA A. DEL CASTILLO  
Attorneys for Receiver  
STEPHEN J. DONELL

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# **PROPOSED ORDER**

**Proposed Order**

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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  
FIRST INTERIM APPLICATIONS  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES  
OF (1) RECEIVER, STEPHEN J.  
DONELL; (2) FORENSIC  
ACCOUNTANT, BRANDLIN &  
ASSOCIATES; AND (3) RECEIVER'S  
COUNSEL, ALLEN MATKINS LECK  
GAMBLE MALLORY & NATSIS  
LLP**

Date: July 11, 2016

Time: 1:30 p.m.

Ctrm: 6

Judge: Hon. Stephen V. Wilson

The Court has reviewed the First Interim Applications for Payment of Fees and Reimbursement of Expenses ("Applications") filed by Stephen J. Donell (the "Receiver"), the permanent receiver for Defendants Suncor Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their respective subsidiaries and affiliates (collectively, the "Receivership Entities"); Brandlin & Associates ("Brandlin"), the Receiver's forensic accountant; and the Receiver's counsel of record, Allen Matkins Leck Gamble Mallory & Natsis, LLP ("Allen Matkins"), for

1 services rendered during the period from December 11, 2015 through March 31,  
2 2016.

3 Having considered the Applications, and all their supporting materials, the  
4 Court finds the fees and costs requested in the Applications are appropriate under  
5 the circumstances and will reasonably, but not excessively, compensate the  
6 Receiver, Brandlin, and Allen Matkins for their respective efforts.

7 Good cause appearing therefor,

8 IT IS HEREBY ORDERED AS FOLLOWS:

9 1. The Receiver's and Brandlin's collective fees in the amount of  
10 \$259,618.80, and collective expenses in the amount of \$1,800.86, are approved;

11 2. The Receiver is authorized and directed to pay himself and Brandlin  
12 90% of the approved fees, or \$233,656.92, and 100% of the approved expenses, or  
13 \$1,800.96, from the assets of the Receivership Entities, on an interim basis;

14 3. Allen Matkins' fees in the amount of \$239,621.40, and expenses in the  
15 amount of \$9,648.33, are approved; and

16 4. The Receiver is authorized and directed to pay Allen Matkins 80% of  
17 the approved fees, or \$191,697.12, and 100% of the approved expenses, or  
18 \$9,648.33, from the assets of the Receivership Entities, on an interim basis.

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20 IT IS SO ORDERED.

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22 Dated: \_\_\_\_\_

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

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**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:

**NOTICE OF SUBMISSION AND MOTION FOR APPROVAL OF FIRST INTERIM APPLICATIONS FOR PAYMENT OF FEES AND REIMBURSEMENT OF EXPENSES OF (1) RECEIVER, STEPHEN J. DONELL; (2) FORENSIC ACCOUNTANT, BRANDLIN & ASSOCIATES; AND (3) RECEIVER'S COUNSEL, ALLEN MATKINS LECK GAMBLE MALLORY & NATSIS LLP; [PROPOSED] ORDER**

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 **June 3, 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,  
hitabashi@phlcorplaw.com, eganous@phlcorplaw.com
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- **Joshua Andrew del Castillo**  
jdelcastillo@allenmatkins.com
- **David R Zaro**  
dzaro@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 **June 3, 2016** at Los Angeles, California.

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