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

14 SECURITIES AND EXCHANGE  
 15 COMMISSION,  
 16 Plaintiff,

16 vs.

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

22 AND

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

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

**STIPULATED REQUEST TO  
 VACATE TRIAL DATE AND OTHER  
 PRETRIAL DEADLINES**

Judge: Hon. Stephen V. Wilson

Ctrm: 6

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1 **STIPULATION**

2 The following Stipulated Request to Vacate Trial Date and Other Pretrial  
3 Deadlines is made by and between Plaintiff Securities and Exchange Commission,  
4 Defendants Robert Yang, Claudia Kano, Relief Defendants Yanrob's Medical, Inc.,  
5 HealthPro Capital Partners, LLC, and Suncor Care, Inc. , and Stephen J. Donell, the  
6 Court-appointed receiver for Defendants Suncor Fontana LLC, Suncor Hesperia LLC  
7 and Suncor Care Lynwood, LLC, by and through their respective counsel of record.

8 All Defendants in this case have now consented to the entry of permanent  
9 injunctions prohibiting them from violating the charged anti-fraud provisions of the  
10 federal securities laws and have agreed that they are liable for disgorgement and/or  
11 civil penalties in amounts to be determined by the Court. Doc. Nos. 71, 83-88.

12 The consents and proposed judgments submitted to the Court contemplate a  
13 process whereby the Court will determine the amounts of disgorgement and civil  
14 penalties the Defendants must pay based on briefing and evidence submitted by the  
15 parties. Under the terms of these documents, all allegations in the Amended  
16 Complaint in this matter are to be deemed true by the Court for the purpose of  
17 calculating monetary liability. Doc. Nos. 71, 83-88

18 The Receiver is in the process of taking control over and, as appropriate,  
19 liquidating the assets of the Receivership entities. This process will help clarify the  
20 amount of investor losses. The receiver expects that this process will be completed  
21 by the end of September 2016, assuming a streamlined asset sale and disposition  
22 strategy can be agreed upon by the parties and undertaken by the Receiver, with  
23 Court approval.

24 The parties believe that summary judgment briefing and a trial on the merits of  
25 the case is unnecessary in light of the consents issued by all Defendants. Therefore,  
26 the parties submit this stipulated request for the Court to vacate the trial date set for  
27 August 30, 2016, the pretrial conference set for August 22, 2016, and the pretrial  
28 deadlines set forth in Local Civil Rule 16.

1 The SEC and counsel for Defendants Yang, Kano, and the Relief Defendants  
2 do, however, intend to engage in the scheduled mediation before Magistrate Judge  
3 Kato on June 23, 2106, in an effort to narrow the issues related to, or reach agreement  
4 on, the monetary judgments against these parties.

5 Undersigned counsel for the SEC has conferred with counsel for the Receiver  
6 and counsel for Defendants Yang and Kano, who concur in the filing's content and  
7 have authorized the filing.

8  
9 Dated: June 9, 2016

Respectfully submitted,

10  
11 By: /s/ Zachary T. Carlyle

Zachary T. Carlyle, Admitted *pro hac vice*

Leslie J. Hughes, Admitted *pro hac vice*

U.S. Securities and Exchange Commission

1961 Stout Street, Suite 1700

Denver, CO 80294-1961

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16 Attorneys for Plaintiff

17 Securities and Exchange Commission

18 ALLEN MATKINS LECK GAMBLE MALLORY &

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JOSHUA A. DEL CASTILLO

21 KENYON HARBISON

22 By: /s/ Joshua A. del Castillo

23 JOSHUA A. DEL CASTILLO

24 Attorneys for Receiver

25 STEPHEN J. DONELL

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MITCHELL SILBERBERG & KNUPP LLP  
MARK T. HIRAIDE

By: /s/ Mark T. Hiraide  
MARK T. HIRAIDE  
Attorneys for Defendants  
ROBERT YANG and CLAUDIA KANO,  
YANROB'S MEDICAL, INC.,  
HEALTHPRO CAPITAL PARTNERS LLC, and  
SUNCOR CARE INC.

**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 June 9, 2016, I caused to be served the document entitled **STIPULATED REQUEST TO VACATE TRIAL DATE AND OTHER PRETRIAL DEADLINES** 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: June 9, 2016

/s/ Zachary T. Carlyle  
Zachary T. Carlyle

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

SECURITIES AND EXCHANGE  
COMMISSION,  
Plaintiff,

vs.

ROBERT YANG,  
CLAUDIA KANO,  
SUNCOR FONTANA, LLC,  
SUNCOR HESPERIA, LLC, AND  
SUNCOR CARE LYNWOOD, LLC  
Defendants,

AND

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

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

**ORDER GRANTING REQUEST TO  
VACATE TRIAL DATE AND OTHER  
PRETRIAL DEADLINES**

Judge: Hon. Stephen V. Wilson

The Court has considered the Stipulation of the parties to vacate the trial date of August 30, 2016 and related pretrial dates, based upon submission of the consents of all the parties to entry of judgments permanently enjoining them from future violations of the anti-fraud provisions of the federal securities laws. The judgments contemplate that the issue of remedies will be resolved through motions filed by the

1 SEC. Good cause appears for the relief the parties' request to vacate the trial date,  
2 the pretrial conference set for August 22, 2016, and the pretrial dates set forth in  
3 Local Rule 16. The Court GRANTS the request and ORDERS:

- 4 1. The trial set for August 30, 2016 and the pretrial conference set for  
5 August 22, 2016 are vacated, as are the pretrial deadlines set forth in  
6 Local Civil Rule 16.
- 7 2. The other deadlines in the case are continued including the date for filing  
8 motions for summary judgment.

9 Dated: June \_\_\_\_, 2016  
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14 Stephen V. Wilson  
15 UNITED STATES DISTRICT JUDGE  
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