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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 AND

24 YANROB'S MEDICAL, INC., et al.
 25 Relief Defendants,.

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

STIPULATION TO CONTINUE
 HEARING ON MOTION OF
 RECEIVER, STEPHEN J. DONELL,
 FOR AUTHORITY TO ABANDON A
 CONTRACT

[Declaration of Stephen J. Donell;
 [Proposed] Order submitted
 concurrently herewith]

Date: June 27, 2016
 Time: 1:30 p.m.
 Ctrm: 6
 Judge: Stephen V. Wilson

STIPULATION

The following Stipulation to Continue Hearing on Motion of Receiver,
 Stephen J. Donnell, for Authority to Abandon a Contract is made by and between
 Stephen J. Donnell (the "Receiver"), the Court-appointed receiver in the above-
 entitled action; Plaintiff Securities and Exchange Commission (the "Commission");
 Defendants Robert Yang and Claudia Kano, and non-party RL Communities, Inc.
 ("RL"), 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
2 December 11, 2015, pursuant to this Court's Preliminary Injunction and Order
3 Appointing Receiver, Freezing Assets, and Providing for Other Ancillary Relief
4 (Dkt. No. 17); and

5 B. On May 27, 2016, the Receiver filed his Notice of Motion and Motion
6 of Receiver, Stephen J. Donell, for Authority to Abandon a Contract (Dkt. No. 72)
7 ("Motion"), along with its accompanying Memorandum of Points and Authorities
8 (Dkt. No. 73), and a Declaration of Receiver, Stephen J. Donell, in Support of
9 Motion for Authority to Abandon a Contract (Dkt. No. 74); and

10 C. The Motion relates to a contract by and between Suncor Care, Inc., and
11 RL Communities, Inc. ("RL"), relating to the sale of that certain land consisting of
12 17.6 acres, Assessor's Parcel Number 0299-111-02/0299-111-08, and commonly
13 known as the "27 Lot Redland Mentone Site" (the "Mentone Property"), which is an
14 asset of the Entities. (Declaration of Stephen J. Donell In Support of Stipulation
15 ["Donell Decl.,"] ¶ 3.)

16 D. Since that time, counsel for non-party RL has reached out to the
17 Receiver, expressing a desire to negotiate a potential amendment to the contract that
18 is at issue in the Motion or a new contract (Donell Decl., ¶ 4); and

19 E. Additionally, RL has provided the Receiver with a specific new offer
20 relating to the Mentone Property and the contract at issue in the Motion, and has
21 sought to have a constructive and substantive dialogue about potential additional
22 amendments to the contract at issue in the Motion, which could obviate the need for
23 any hearing on the Motion, and which could be mutually beneficial both for RL and
24 for the Entities (Donell Decl., ¶ 5-6); and

25 F. The Receiver, in his business judgment, accordingly wishes to delay
26 the hearing on the Motion for a short period of time, in order to participate in
27 meaningful negotiations with RL (Donell Decl. ¶ 7), and no party to the above-
28 entitled action has any objection to this course of action; and

1 G. Should the Receiver and RL arrive at any new or amended deal relating
2 to the contract at issue in the Motion, the Receiver will meet and confer with the
3 Commission, and with all other parties in the above-entitled action, prior to seeking
4 to remove the Motion from the Court's calendar and prior to any attempt to
5 consummate a new or amended sale relating to the Mentone Property. (Donell
6 Decl., ¶ 8.)

7 **STIPULATION AND AGREEMENT**

8 Accordingly, and in consideration of the foregoing, the Receiver, the
9 Commission, Defendants Yang and Kano, and non-party RL all STIPULATE and
10 AGREE as follows:

- 11 1. The date of the hearing on the Motion shall be continued from June 27,
- 12 2016 to August 1, 2016; and
- 13 2. Opposition briefs relating to the Motion shall be due on July 18, 2016;
- 14 3. Reply briefs relating to the Motion shall be due on July 25, 2016.

15
16 Dated: June 23, 2016

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

19 By: /s/ Kenyon Harbison

20 KENYON HARBISON
21 Attorneys for Receiver
STEPHEN J. DONELL

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25 [Additional Signatures re: Stipulation to
26 Continue Hearing on Motion of Receiver,
27 Stephen J. Donnell, for Authority to Abandon
a Contract, Continued on Next Page]

1 Dated: June 23, 2016

SECURITIES AND EXCHANGE
COMMISSION
ZACHARY T. CARLYLE

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3

By: /s/ Zachary T. Carlyle

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ZACHARY T. CARLYLE
Attorneys for Plaintiff
SECURITIES AND EXCHANGE
COMMISSION

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6

7 Dated: June 23, 2016

MITCHELL SILBERBERG
& KNUPP LLP
MARK T. HIRAIDE

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9

By: /s/ Mark T. Hiraide

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MARK T. HIRAIDE
Attorneys for Defendants
ROBERT YANG and CLAUDIA
KANO

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12

13 Dated: June 23, 2016

ARCHER NORRIS, PLC
DOUGLAS C. STRAUS

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By: /s/ Douglas C. Straus

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DOUGLAS C. STRAUS
Attorneys for Non-Party RL
Communities, Inc.

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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
STIPULATION TO CONTINUE
HEARING ON MOTION OF
RECEIVER, STEPHEN J. DONELL,
FOR AUTHORITY TO ABANDON A
CONTRACT

[Stipulation to Continue Hearing;
Declaration of Stephen J. Donell
submitted concurrently herewith]

Date: June 27, 2016
Time: 1:30 p.m.
Ctvm: 6
Judge: Hon. Stephen V. Wilson

ORDER ON STIPULATION

The Court has reviewed and considered the Stipulation to Continue Hearing on Motion of Receiver, Stephen J. Donell, for Authority to Abandon a Contract (the "Stipulation"), relating to Docket No. 72, that was entered into by and between Stephen J. Donell (the "Receiver"), Plaintiff Securities and Exchange Commission (the "Commission"); Defendants Robert Yang and Claudia Kano, and non-party RL Communities, Inc. ("RL"), by and through their respective counsel of record. Good

1 cause appearing therefor, the Court GRANTS the Stipulation and ORDERS as
2 follows:

3 1. The currently scheduled hearing date of June 27, 2016, on the Motion
4 of Receiver, Stephen J. Donell, for Authority to Abandon a Contract ("Motion") is
5 VACATED;

6 2. The date for the hearing on the Motion shall be CONTINUED from
7 June 27, 2016 to August 1, 2016, at 1:30 p.m.

8 3. Opposition briefs relating to the Motion shall be due on or before July
9 18, 2016;

10 4. Reply briefs relating to the Motion shall be due on or before July 25,
11 2016.

12 **IT IS SO ORDERED.**

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14
15 Dated: June _____, 2016

16 Hon. Stephen V. Wilson
17 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:

**STIPULATION TO CONTINUE HEARING ON MOTION
OF RECEIVER, STEPHEN J. DONELL, FOR AUTHORITY TO
ABANDON A CONTRACT; [PROPOSED] ORDER GRANTING
STIPULATION TO CONTINUE HEARING**

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 23, 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**
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- **David R Zaro**
dzaro@allenmatkins.com

2. **SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served):** On **June 23, 2016** , 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. Or, I deposited in a box or other facility regularly maintained by FedEx, or delivered to a courier or driver authorized by said express service carrier to receive documents, a true copy of the foregoing document(s) in sealed envelopes or packages designated by the express service carrier, addressed as indicated above on the above-mentioned date, with fees for overnight delivery paid or provided for.

Attorneys for Non-Party, RL
Communities, Inc.
Douglas C. Straus, Esq.
Archer Norris
2033 N. Main Street, Suite 800
Walnut Creek, CA 94596

Via Federal Express

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 23, 2016** at Los Angeles, California.

s/ Martha Diaz
Martha Diaz