

1 DAVID R. ZARO (BAR NO. 124334)
 2 JOSHUA A. DEL CASTILLO (BAR NO. 239015)
 3 KENYON HARBISON (BAR NO. 260416)
 ALLEN MATKINS LECK GAMBLE
 4 MALLORY & NATSIS LLP
 515 South Figueroa Street, Ninth Floor
 4 Los Angeles, California 90071-3309
 Phone: (213) 622-5555
 5 Fax: (213) 620-8816
 E-Mail: dzaro@allenmatkins.com
 6 jdelcastillo@allenmatkins.com
 kharbison@allenmatkins.com

7 Attorneys for Receiver
 8 STEPHEN J. DONELL

9 UNITED STATES DISTRICT COURT
 10 CENTRAL DISTRICT OF CALIFORNIA

11
 12 SECURITIES AND EXCHANGE
 COMMISSION,

13 Plaintiff,

14 v.

15 ROBERT YANG, et al.
 16 Defendants,

17 AND

18 YANROB'S MEDICAL, INC., et al.
 19 Relief Defendants,.

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

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

[Stipulation to Continue Hearing on
 Motion of Receiver; [Proposed] Order
 submitted concurrently herewith]

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

DECLARATION OF STEPHEN J. DONELL

I, Stephen J. Donell, declare as follows:

1. I am the receiver appointed by this Court for Defendants Suncor Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their respective subsidiaries and affiliates (collectively, the "Receivership Entities" or "Entities"). I make this Declaration in support of the concurrently filed Stipulation to Continue Hearing on Motion of Receiver (the "Stipulation"). I have personal knowledge of the facts set forth herein and, if called to testify, could testify competently thereto.

2. On May 27, 2016, I caused to be filed my Notice of Motion and Motion of Receiver, Stephen J. Donell, for Authority to Abandon a Contract (Dkt. No. 72) ("Motion"), along with its accompanying Memorandum of Points and Authorities (Dkt. No. 73), and a Declaration of Receiver, Stephen J. Donell, in Support of Motion for Authority to Abandon a Contract (Dkt. No. 74), set for hearing on June 27, 2016.

3. The Motion relates to a contract by and between Suncor Care, Inc., and RL Communities, Inc. ("RL"), relating to the sale of that certain land consisting of 17.6 acres, Assessor's Parcel Number 0299-111-02/0299-111-08, and commonly known as the "27 Lot Redland Mentone Site" (the "Mentone Property"), which is an asset of the Entities.

4. On or about June 12, 2016, counsel for RL contacted me through my counsel in the above-entitled action, relating to the Motion, expressing a desire to negotiate a potential amendment to the contract that is at issue in the Motion.

5. RL has sought to have a constructive and substantive dialogue about potential additional amendments to the contract at issue in the Motion, which could obviate the need for any hearing on the Motion, and which could be mutually beneficial both for RL and for the Entities.

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:

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

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**
mth@msk.com,kjue@phlcorplaw.com,
hitabashi@phlcorplaw.com,eganous@phlcorplaw.com
- **Leslie J. Hughes**
hughesLJ@sec.gov,kasperg@sec.gov,pinkstonm@sec.gov,
nesvign@sec.gov
- **George D. Straggas**
George.straggas@straggasdean.com;sarah.borghese@straggasdean.com,
eric.dean@straggasdean.com
- **David J. Van Havermaat**
vanhavermaatd@sec.gov,larofiling@sec.gov,berryj@sec.vog,
irwinma@sec.gov
- **Joshua Andrew del Castillo**
jdelcastillo@allenmatkins.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- **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