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 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
 SECOND 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;
 Second Interim Application of Receiver
 and Forensic Accountant; Second Interim
 Application of Allen Matkins;
 Declaration of Stephen J. Donell; and
 [Proposed] Order submitted concurrently
 herewith]

Date: November 7, 2016

Time: 1:30 p.m.

Ctrl: 6

Judge: Hon. Stephen V. Wilson

1 **TO ALL INTERESTED PARTIES AND THIS HONORABLE COURT:**
 2 **PLEASE TAKE NOTICE THAT** on November 7, 2016, at 1:30 p.m., or as
 3 soon thereafter as this matter may be heard in Courtroom 6 of the above-entitled
 4 Court, 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 Second 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, Brandlin¹, 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 April 1, 2016 through June 30, 2016, and payment, on an
 16 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	\$68,423.42	N/A	\$68,423.42
Allen Matkins	\$94,767.84	\$3,898.57	\$98,666.41
<u>TOTAL:</u>	\$163,191.26	\$3,898.57	\$167,089.83

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

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

1 Please also note that the Receiver's, Brandlin's, and Allen Matkins' First
2 Interim Applications for Payment of Fees and Reimbursement of Expenses (the
3 "Original Applications"), which covered the period from December 2015 through
4 March 2016, were filed on June 3, 2016, and heard on July 11, 2016. As of the date
5 of submission of the current Applications, which cover the period from April 2016
6 through June 2016, the Court has not yet entered an order on the Original
7 Applications.

8
9 Dated: October 7, 2016

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

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12 By: /s/ Joshua A. del Castillo

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

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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
SECOND 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: November 7, 2016
Time: 1:30 p.m.
Ctrm: 6
Judge: Hon. Stephen V. Wilson

The Court has reviewed the Second 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 Allen Matkins Leck Gamble Mallory & Natsis, LLP ("Allen Matkins") the Receiver's counsel of record, for services rendered during the period from April 1, 2016 through June 30, 2016.

PROPOSED ORDER

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

5 Good cause appearing therefor,

6 IT IS HEREBY ORDERED AS FOLLOWS:

7 1. The Receiver's and Brandlin's collective fees, in the amount of
8 \$76,026.02, are approved;

9 2. The Receiver is authorized and directed to pay himself and Brandlin
10 90% of the approved fees, or \$68,423.42, from the assets of the Receivership
11 Entities, on an interim basis;

12 3. Allen Matkins' fees, in the amount of \$118,459.80, and expenses, in the
13 amount of \$3,898.57, are approved; and

14 4. The Receiver is authorized and directed to pay Allen Matkins 80% of
15 the approved fees, or \$94,767.84, and 100% of the approved expenses, or \$3,898.57,
16 from the assets of the Receivership Entities, on an interim basis.

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18 IT IS SO ORDERED.

19

20 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 865 S. Figueroa Street, Suite 2800, Los Angeles, California 90017-2543.

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 SECOND 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 **October 7, 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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- **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. 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.

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 **October 7, 2016** at Los Angeles, California.

/s/ Martha Diaz

Martha Diaz