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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  
FIFTH INTERIM APPLICATION  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES  
OF RECEIVER AND HIS  
PROFESSIONALS**

[Memorandum of Points and Authorities;  
Fifth Interim Application of Receiver and  
His Professionals; Declaration of Stephen  
J. Donell; and [Proposed] Order  
submitted concurrently herewith]

Date: January 29, 2018  
Time: 1:30 p.m.  
Ctrm: 10A  
Judge: Hon. Stephen V. Wilson

**TO ALL INTERESTED PARTIES AND THIS HONORABLE COURT:**

**PLEASE TAKE NOTICE THAT** on January 29, 2018 at 1:30 p.m., or as  
soon thereafter as this matter may be heard in Courtroom 10A of the above-entitled  
Court, located at 350 W. 1st Street, 10th Fl., Los Angeles, California 90012,  
Stephen J. Donell, (the "Receiver") as the permanent receiver for Defendants Suncor  
Fontana, LLC, Suncor Hesperia, LLC, Suncor Care Lynwood, LLC, and their

1 respective subsidiaries and affiliates, will and hereby does move this Court for an  
 2 Order granting the Fifth Interim Application for Payment of Fees and  
 3 Reimbursement of Expenses (the "Application") of the Receiver and his counsel of  
 4 record, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins" or  
 5 "Professionals").

6 The Application of the Receiver and Allen Matkins has been submitted  
 7 concurrently herewith. Pursuant to the Application, the Receiver and Allen Matkins  
 8 seek approval of all of their respective fees and expenses incurred from January 1,  
 9 2017 through March 31, 2017, as follows:

<u>Applicant</u>	<u>Current Fees</u>	<u>Current Expenses</u>	<u>Total Amount Requested for Approval</u>
Receiver	\$44,446.70	\$417.46	\$44,864.16
Allen Matkins	\$86,994.70	\$359.68	\$87,354.38
<b><u>TOTAL:</u></b>	\$131,441.40	\$777.14	\$132,218.54

15 Pursuant to the Application, the Receiver seeks authorization to pay himself  
 16 90% of the approved fees and 100% of the approved expenses from the assets of the  
 17 Receivership Entities, on an interim basis. Additionally, the Receiver seeks  
 18 authorization to pay Allen Matkins 80% of the approved fees and 100% of the  
 19 approved expenses from the assets of the Receivership Entities, on an interim basis.  
 20 The respective amounts of fees and expenses incurred from January 1, 2017 through  
 21 March 31, 2017 that are currently requested for payment are as follows:

<u>Applicant</u>	<u>Current Fees Requested for Payment</u>	<u>Current Expenses Requested for Payment</u>	<u>Total Amount Requested for Payment</u>
Receiver	\$40,002.03	\$417.46	\$40,419.49
Allen Matkins	\$69,595.76	\$359.68	\$69,955.44
<b><u>TOTAL:</u></b>	\$109,597.79	\$777.14	\$110,374.93

1 The Application is based on this Notice of Submission and Motion for  
2 Approval of Fifth Interim Application for Payment of Fees and Reimbursement of  
3 Expenses, the Application itself, as well as the concurrently filed Memorandum of  
4 Points and Authorities, and Declaration of Stephen J. Donell, along with any  
5 argument or evidence presented to the Court at the hearing on this Motion.

6 Please also note that the Receiver's and Allen Matkins' First Interim  
7 Applications for Payment of Fees and Reimbursement of Expenses (the "Original  
8 Applications"), which covered the period from December 2015 through March  
9 2016, were filed on June 3, 2016, and heard on July 11, 2016, and the Second  
10 Interim Applications for Payments of Fees and Reimbursement of Expenses (the  
11 "Second Applications"), which covered the period from April 1, 2016 through June  
12 30, 2016, were filed on October 7, 2017 and the hearing was vacated. The order on  
13 the Second Applications was entered on November 3, 2016, and the order granting  
14 the First Applications was entered on November 8, 2016. The Third Interim  
15 Applications for Payment of Fees and Reimbursement of Expenses (the "Third  
16 Applications"), which covered the period from July 1, 2016 through September 30,  
17 2016 was filed on January 11, 2017, and the order granting the Third Applications  
18 was entered on February 16, 2017. The Fourth Interim Applications for Payment of  
19 Fees and Reimbursement of Expenses (the "Fourth Applications"), which covered  
20 the period from October 1, 2016 through December 31, 2016 was filed on June 7,  
21 2017, and the order granting the Fourth Applications was entered on June 22, 2017.

22 Dated: December 19, 2017

23 ALLEN MATKINS LECK GAMBLE  
24 MALLORY & NATSIS LLP  
25 DAVID R. ZARO  
26 JOSHUA A. DEL CASTILLO  
27 MELISSA K. ZONNE

28 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  
FIFTH INTERIM APPLICATION  
FOR PAYMENT OF FEES AND  
REIMBURSEMENT OF EXPENSES  
OF THE RECEIVER AND HIS  
PROFESSIONALS**

Date: January 29, 2018

Time: 1:30 p.m.

Judge: Hon. Stephen V. Wilson

**ORDER**

The Court has reviewed the Fifth Interim Application for Payment of Fees and Reimbursement of Expenses ("Application") 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") and Allen Matkins Leck Gamble Mallory & Natsis, LLP ("Allen Matkins") the Receiver's counsel of record, for services rendered during the period from January 1, 2017 through March 31, 2017.

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

5 Good cause appearing therefor,

6 IT IS HEREBY ORDERED AS FOLLOWS:

7 1. The Receiver's fees, in the amount of \$44,446.70, and expenses, in the  
8 amount of \$417.46, are approved;

9 2. The Receiver is authorized and directed to pay himself 90% of the  
10 approved fees, or \$40,002.03, and 100% of the approved expenses, or \$417.46, from  
11 the assets of the Receivership Entities, on an interim basis;

12 3. Allen Matkins' fees, in the amount of \$86,994.70, and expenses, in the  
13 amount of \$359.68, are approved; and

14 4. The Receiver is authorized and directed to pay Allen Matkins 80% of  
15 the approved fees, or \$69,595.76, and 100% of the approved expenses, or \$359.68,  
16 from the assets of the Receivership Entities, on an interim basis.

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18 IT IS SO ORDERED.

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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 FIFTH INTERIM APPLICATION FOR PAYMENTS OF FEES AND REIMBURSEMENT OF EXPENSES OF RECEIVER AND HIS PROFESSIONALS**

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 **December 19, 2017**, 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**  
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irwinma@sec.gov
- **Joshua Andrew del Castillo**  
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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 **December 19, 2017**, 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.

Franchise Tax Board (FTB) **Via U.S. Mail**  
P.O. Box 2952  
Sacramento, CA 95812-2952

Internal Revenue Service **Via U.S. Mail**  
880 Front Street  
San Diego, CA 92101-8869

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 **December 19, 2017** at Los Angeles, California.

/s/ Martha Diaz  
Martha Diaz