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11 Attorneys for Receiver
12 THOMAS A. SEAMAN

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA
15 SOUTHERN DIVISION

16 SECURITIES AND EXCHANGE
COMMISSION,
17 Plaintiff,

18 v.

19 EMILIO FRANCISCO; PDC CAPITAL
GROUP, LLC; CAFFE PRIMO
INTERNATIONAL, INC.; SAL ASSISTED
20 LIVING, LP; SAL CARMICHAEL, LP; SAL
CITRUS HEIGHTS, LP; SAL KERN
21 CANYON, LP; SAL PHOENIX, LP; SAL
WESTGATE, LP; SUMMERPLACE AT
22 SARASOTA, LP; SUMMERPLACE AT
CLEARWATER, LP; SUMMERPLACE AT
23 CORRELL PALMS, LP; TRC TUCSON, LP;
CLEAR CURRENTS WEST, LP; CAFFE
24 PRIMO MANAGEMENT, LP; CAFFE
PRIMO MANAGEMENT 102, LP; CAFFE
25 PRIMO MANAGEMENT 103, LP; CAFFE
PRIMO MANAGEMENT 104, LP; CAFFE
26 PRIMO MANAGEMENT 105, LP; CAFFE
PRIMO MANAGEMENT 106, LP; CAFFE
27 PRIMO MANAGEMENT 107, LP; and
CAFFE PRIMO MANAGEMENT 108, LP,
28 Defendants.

Case No. 8:16-cv-02257-CJC-DFM

**NOTICE OF HEARING ON
INTERIM FEE APPLICATIONS
OF THE RECEIVER AND HIS
PROFESSIONALS FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF
EXPENSES**

Date: October 2, 2017
Time: 1:30 p.m.
Ctrm: 9B, 9th Floor
Judge: Hon. Cormac J. Carney

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on October 2, 2017, at 1:30 p.m. in
3 Courtroom 9B – 9th Floor, of the above-entitled Court, located at 4 11 W. Fourth
4 Street, Santa Ana, California, 92701, the Court will consider the interim applications
5 of Thomas A. Seaman ("Receiver"), the Court-appointed receiver for the Defendant
6 entities¹ (collectively, "Receivership Entities"), his general counsel, Allen Matkins
7 Leck Gamble Mallory & Natsis LLP ("Allen Matkins"), and his consultant, Berkeley
8 Research Group, LLC ("BRG"), for approval and payment of fees and expenses
9 ("Applications").

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¹ The entities included in the receivership are PDC Capital Group, LLC ("PDC"); Caffè Primo International, Inc. ("Caffè Primo"); SAL Senior Living, LP ("SAL Senior Living"); SAL Carmichael, LP ("SAL Carmichael"); SAL Citrus Heights, LP ("SAL Citrus Heights"); SAL Kern Canyon, LP ("SAL Kern Canyon"); SAL Phoenix, LP ("SAL Phoenix"); SAL Westgate, LP ("SAL Westgate"); Summerplace at Sarasota, LP ("Sarasota"); Summerplace at Clearwater, LP ("Clearwater"); Summerplace at Correll Palms, LP ("Correll Palms"); TRC Tucson, LP ("TRC Tucson"); Clear Currents West, LP ("Clear Currents"); Caffè Primo Management, LP ("CPM"); Caffè Primo Management 102, LP ("CPM 102"); Caffè Primo Management 103, LP ("CPM 103"); Caffè Primo Management 104, LP ("CPM 104"); Caffè Primo Management 105, LP ("CPM 105"); Caffè Primo Management 106, LP ("CPM 106"); Caffè Primo Management 107, LP ("CPM 107"); Caffè Primo Management 108, LP ("CPM 108"); and their subsidiaries and affiliates, including but not limited to, Summerplace Management, LLC ("Summerplace Management"); PDC Partners Management, Inc. ("PDC PM"); and FDC Partners Management, Inc. ("FDC PM") (collectively, "Named Entities"); and their subsidiaries and affiliates Summerplace Management, LLC; PDC Partners Management, Inc.; FDC Partners Management, Inc.; KPF Capital, LLC; FDC Capital Partners, LLC; MSL US Fund I, LLC; MPoint Land & Development, Inc.; Woodcrest Construction Management, Inc.; Professional Loading Service, LLLP; WDC Capital Group, LLC; WDC Capital Partners, LLC; KPF Investment Management, Inc.; Meridian Summerplace at Snug Harbor, LLC; Meridian Summerplace at Snug Harbor, LP; Summerplace at Correll Palms, LLC; Summerplace at Correll Palms, LP; Summerplace at Winter Haven, LLC; Summerplace at Winter Haven, LP; Summerplace at Sun City, LLC; Summerplace at Sun City, LP; Meridian at Sun City, LLC; Summerplace at Orlando-Summerfield, LLC; Summerplace at Orlando-Summerfield, LP; Summerplace at Kissimmee, LLC; Summerplace at Kissimmee, LP; Summerplace at Merced, LLC; Summerplace at Merced, LP; SAL-PDC, LLC; SLALMC, LLC; SAL Lincoln Village, IL; Lincoln Village IL, LLC; Lincoln Village IL, LP; Lincoln Village SNF, LLC; Lincoln Village SNF, LP; FCM Development Group, LLC; ADC Capital Group, LLC; NCDC Capital Partners, LLC; Summerplace at Bonney Lake MC, LLC; Summerplace at Bonney Lake MC, LP; Summerplace Management, LLC; Summerplace Development, LLC; Defiance Charters, LLC; and Red Sunshine Holdings, Ltd. (collectively, "Affiliated Entities").

1 The following table summarizes the fees incurred, interim payment requested,
 2 and costs requested by the Receiver and Allen Matkins for the period from the
 3 Receiver's appointment through April 30, 2017:

4 Applicant	5 Fees Incurred	6 Interim Payment Requested	7 Costs	8 Total Payment Requested
9 Thomas A. Seaman, 10 Receiver	\$297,672.50	\$267,905.25 (90%)	\$0.00 (100%)	\$267,905.25
11 Allen Matkins Leck 12 Gamble Mallory & 13 Natsis LLP, 14 General Counsel	\$362,720.70	\$290,176.56 (80%)	\$17,940.60 (100%)	\$308,117.16

15 The following table summarizes the fees incurred, interim payment requested,
 16 and costs requested by BRG for the period from January 1, 2017, through April 30,
 17 2017:

18 Applicant	19 Fees Incurred	20 Interim Payment Requested	21 Costs	22 Total Payment Requested
23 Berkeley Research 24 Group, LLC, 25 Consultant	\$42,969.00	\$38,672.10 (90%)	\$2,230.49 (100%)	\$40,902.59

26 **Procedural Requirements:** If you oppose the Applications, you are required
 27 to file your written opposition with the Office of the Clerk, United States District
 28 Court, 411 W. Fourth Street, Room 1053, Santa Ana, California 92701-4516 and
 serve the same on the undersigned not later than 21 calendar days prior to the
 hearing.

1 IF YOU FAIL TO FILE AND SERVE A WRITTEN OPPOSITION by the
2 above date, the Court may grant the requested relief without further notice.

3
4 Dated: August 25, 2017

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

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6 By: /s/ Edward Fates

7 EDWARD G. FATES
8 Attorneys for Receiver
9 THOMAS A. SEAMAN
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