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10 Attorneys for Receiver  
11 THOMAS A. SEAMAN

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA

14  
15 SECURITIES AND EXCHANGE  
COMMISSION,  
16 Plaintiff,

17 v.

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

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

**NOTICE OF MOTION AND  
MOTION OF RECEIVER FOR  
ORDER: (1) APPROVING  
FINAL REPORT AND  
ACCOUNTING;  
(2) AUTHORIZING PAYMENT  
OF FINAL FEE APPLICATIONS  
OF RECEIVER AND  
PROFESSIONALS;  
(3) AUTHORIZING  
DESTRUCTION OF RECORDS;  
AND (4) DISCHARGING AND  
RELEASING RECEIVER**

Date: January 24, 2022  
Time: 1:30 p.m.  
Ctrm: 7C  
Judge: Hon. Cormac J. Carney

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on January 24, 2022, at 1:30 p.m., in  
3 Courtroom 7C of the above-entitled Court, located at 350 W. First Street, Los  
4 Angeles, California 90012, Thomas A. Seaman (the "Receiver"), the Court-  
5 appointed permanent receiver for PDC Capital Group, LLC, and its subsidiaries and  
6 affiliates (collectively, the "Receivership Entities") will and does hereby move for an  
7 order (1) Approving Receiver's Final Report and Accounting ("Final Report");  
8 (2) Approving and Authorizing Payment of Receiver's and his Professionals'  
9 respective Final Applications for Payment of Fees and Reimbursement of Expenses  
10 (the "Final Fee Applications"); (3) Authorizing Destruction of Records; and  
11 (4) Discharging and Releasing the Receiver (the "Motion").

12 Counsel for the Receiver conferred with counsel for parties at least seven days  
13 before filing the Motion.

14 The Motion is based on this Notice of Motion and Motion, the concurrently-  
15 submitted Memorandum of Points and Authorities, and the Declaration of Thomas A.  
16 Seaman, and such other material and information as the Court may consider in  
17 connection herewith.

18 **Procedural Requirements:** If you oppose this Motion, you are required to  
19 file your written opposition with the Office of the Clerk, United States District Court,  
20 Central District of California, 411 W. Fourth Street, Santa Ana, California 92701,  
21 and serve the same on the undersigned no later than 14 calendar days prior to the  
22 hearing on this Motion.

23  
24 Dated: December 17, 2021

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

25  
26 By:           /s/ David R. Zaro          

27 DAVID R. ZARO  
Attorneys for Receiver  
28 THOMAS A. SEAMAN