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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: January 29, 2018  
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 January 29, 2018, 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 entities<sup>1</sup> (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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14 <sup>1</sup> The entities included in the receivership are PDC Capital Group, LLC ("PDC"); Caffè Primo  
15 International, Inc. ("Caffè Primo"); SAL Senior Living, LP ("SAL Senior Living");  
16 SAL Carmichael, LP ("SAL Carmichael"); SAL Citrus Heights, LP ("SAL Citrus Heights");  
17 SAL Kern Canyon, LP ("SAL Kern Canyon"); SAL Phoenix, LP ("SAL Phoenix");  
18 SAL Westgate, LP ("SAL Westgate"); Summerplace at Sarasota, LP ("Sarasota");  
19 Summerplace at Clearwater, LP ("Clearwater"); Summerplace at Correll Palms, LP ("Correll  
20 Palms"); TRC Tucson, LP ("TRC Tucson"); Clear Currents West, LP ("Clear Currents"); Caffè  
21 Primo Management, LP ("CPM"); Caffè Primo Management 102, LP ("CPM 102"); Caffè  
22 Primo Management 103, LP ("CPM 103"); Caffè Primo Management 104, LP ("CPM 104");  
23 Caffè Primo Management 105, LP ("CPM 105"); Caffè Primo Management 106, LP  
24 ("CPM 106"); Caffè Primo Management 107, LP ("CPM 107"); Caffè Primo  
25 Management 108, LP ("CPM 108"); and their subsidiaries and affiliates, including but not  
26 limited to, Summerplace Management, LLC ("Summerplace Management"); PDC Partners  
27 Management, Inc. ("PDC PM"); and FDC Partners Management, Inc. ("FDC PM")  
28 (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 May 1, 2017, through July 31, 2017:

4 Applicant	5 Fees Incurred	6 Interim Payment Requested	7 Costs	8 Total Payment Requested
9 Thomas A. Seaman, 10 Receiver	\$170,094.00	\$153,084.60 (90%)	\$0.00 (100%)	\$153,084.60
11 Allen Matkins Leck 12 Gamble Mallory & 13 Natsis LLP, 14 General Counsel	\$208,980.45	\$167,184.36 (80%)	\$4,475.10 (100%)	\$171,659.46

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  
 17 September 30, 2017:

18 Applicant	19 Fees Incurred	20 Interim Payment Requested	21 Costs	22 Total Payment Requested
23 Berkeley Research 24 Group, LLC, 25 Consultant	\$7,226.00	\$6,503.40 (90%)	\$431.46 (100%)	\$6,934.86

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.

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4 Dated: December 18, 2017

ALLEN MATKINS LECK GAMBLE  
MALLORY & NATSIS LLP

5  
6 By:           /s/ Edward Fates          

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