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KRISTA L. FREITAG

9 **UNITED STATES DISTRICT COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **WESTERN DIVISION**

12 SECURITIES AND EXCHANGE
COMMISSION,

13 Plaintiff,

14 v.

15 WORLD CAPITAL MARKET INC.;
16 WCM777 INC.; WCM777 LTD. d/b/a
WCM777 ENTERPRISES, INC.; and
17 MING XU a/k/a PHIL MING XU,

18 Defendants,

19 KINGDOM CAPITAL MARKET, LLC;
MANNA HOLDING GROUP, LLC;
20 MANNA SOURCE INTERNATIONAL,
INC.; WCM RESOURCES, INC.;
21 AEON OPERATING, INC.; PMX
JEWELS, LTD.; TOPACIFIC INC.;
22 TO PACIFIC INC.; VINCENT J.
MESSINA; and INTERNATIONAL
23 MARKET VENTURES,

24 Relief Defendants.
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Case No. CV-14-2334-JFW-MRW

ASSIGNED FOR ALL PURPOSES TO
Judge John F. Walter

SUPPLEMENTAL DECLARATION OF
DAVID ZARO IN SUPPORT OF FIRST
INTERIM FEE APPLICATION OF
ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS, FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF EXPENSES

Date: November 10, 2014
Time: 1:30 p.m.
Ctm: 16

DECLARATION OF DAVID ZARO

I, David Zaro, declare:

1. I am an attorney at the law firm of Allen Matkins Leck Gamble Mallory & Natsis LLP, ("Allen Matkins") counsel of record for Krista L. Freitag ("Receiver"), Court-appointed receiver for Defendants World Capital Market Inc. ("WCM"), WCM777 Inc., and WCM777 Ltd. d/b/a WCM777 Enterprises, Inc., Relief Defendants Kingdom Capital Market, LLC; Manna Holding Group, LLC; Manna Source International, Inc.; WCM Resources, Inc.; ToPacific Inc.; To Pacific Inc.; and their subsidiaries and affiliates (collectively, "Receivership Entities").

2. This Supplemental Declaration is made in support of Allen Matkins' First Interim Fee Application ("Fee Application") [Dkt. 215] and in response to the Court's rulings regarding certain fees and costs contained in the invoices submitted by Allen Matkins in support of the Fee Application, which invoices were attached as Exhibit "A" to the Fee Application [Dkt. 251-1]. I have personal knowledge of the facts of this declaration as to which I could and would personally and competently testify to if called upon to do so.

3. Following the hearing on the Fee Application on November 10, 2014, I reviewed the invoices attached as Exhibit "A" to the Fee Application for the purpose of identifying and writing off the following items: (a) travel and meal charges; (b) text editing and fax charges; and (c) interoffice attorney conferences. In addition, per the Court's request, I also considered and identified the number of entries that appear to be inappropriate in light of the Court's rulings and guidance provided at the hearing. Below is a list of entries that I identified with regard to each category. Within each category, I have totaled the amount for the entries and then reduced the total fees and costs requested by Allen Matkins to account for these write-offs.

1 4. The date of each entry and the amount charged (costs) for travel and
 2 meal costs are as follows:

Category	Date	Amount
General Receivership – Travel	03/27/14	\$178.16
General Receivership – Meal	03/28/14	8.43
General Receivership – Meal	03/28/14	15.19
General Receivership – Travel	04/23/14	90.00
General Receivership – Travel	05/27/14	90.00
General Receivership – Travel	05/28/14	11.75
General Receivership – Meal	05/28/14	38.06
General Receivership – Travel	06/02/14	90.00
General Receivership – Travel	06/03/14	25.00
General Receivership – Travel	06/06/14	90.00
General Receivership – Travel	06/09/14	11.45
	Subtotal	\$666.04

13 5. The date and amount of each charge for text editing and faxing are as
 14 follows:
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Category	Date	Amount
General Receivership – Cost	03/31/14	46.00
General Receivership – Cost	04/02/14	6.00
General Receivership – Cost	04/04/14	10.00
General Receivership – Cost	04/22/14	48.00
General Receivership – Cost	03/31/14	46.00
General Receivership – Cost	04/02/14	6.00
General Receivership – Cost	04/04/14	10.00
General Receivership – Cost	04/22/14	48.00
General Receivership – Cost	04/24/14	90.00
General Receivership – Costs	04/25/14	6.00
General Receivership – Cost	05/05/14	21.00
General Receivership – Cost	05/06/14	42.00
General Receivership – Cost	05/14/14	12.00
General Receivership – Cost	05/20/14	18.00
General Receivership – Cost	05/29/14	3.00
General Receivership – Cost	06/17/14	9.00

Category	Date	Amount
Asset Investigation & Recovery – Cost	04/24/14	21.00
Operations & Asset Sales – Cost	05/05/14	66.00
Operations & Asset Sales – Cost	05/19/14	15.00
	Subtotal	\$523.00
	Total Costs	\$1,189.04

6. The date of each entry and the amounts charged (fees) for interoffice communications are as follows:

Category	Date	Amount
General Receivership – Fees	03/27/14	\$59.40
General Receivership – Fees	04/21/14	133.65
Asset Investigation & Recovery – Fees	03/30/14	89.10
Asset Investigation & Recovery – Fees	03/31/14	89.10
Asset Investigation & Recovery – Fees	04/03/14	209.90
Asset Investigation & Recovery – Fees	04/04/14	118.80
Asset Investigation & Recovery – Fees	04/08/14	59.60
Asset Investigation & Recovery – Fees	04/09/14	89.10
Asset Investigation & Recovery – Fees	04/10/14	89.10
Asset Investigation & Recovery – Fees	04/11/14	118.80
Asset Investigation & Recovery – Fees	04/16/14	29.70
Asset Investigation & Recovery – Fees	04/17/14	203.85
Asset Investigation & Recovery – Fees	04/22/14	135.90
Asset Investigation & Recovery – Fees	04/29/14	135.90
Asset Investigation & Recovery – Fees	05/06/14	123.30
Asset Investigation & Recovery – Fees	05/08/14	44.55
Asset Investigation & Recovery – Fees	05/14/14	89.10
Asset Investigation & Recovery – Fees	05/16/14	59.40
Asset Investigation & Recovery – Fees	05/21/14	59.40
Asset Investigation & Recovery – Fees	06/19/14	59.40
Asset Investigation & Recovery – Fees	06/25/14	59.40
Asset Investigation & Recovery – Fees	06/27/14	237.60
Operations & Asset Sales – Fees	05/06/14	91.80
Operations & Asset Sales – Fees	05/19/14	137.70
Operations & Asset Sales – Fees	06/18/14	70.20
Operations & Asset Sales – Fees	06/19/14	70.20

Category	Date	Amount
Operations & Asset Sales – Fees	06/24/14	117.90
	Subtotal	\$2,781.85

7. The date of each entry and the amounts charged (fees) for travel time and other identified write-offs are as follows:

Category	Date	Amount
General Receivership – Fees	03/28/14	\$668.25
General Receivership – Fees	03/31/14	89.10
General Receivership – Fees	04/02/14	59.40
General Receivership – Fees	04/16/14	44.55
General Receivership – Fees	06/09/14	1,113.75
Asset Investigation & Recovery – Fees	04/04/14	246.60
Asset Investigation & Recovery – Fees	04/11/14	267.30
Asset Investigation & Recovery – Fees	04/14/14	184.95
Asset Investigation & Recovery – Fees	05/22/14	89.10
Asset Investigation & Recovery – Fees	05/28/14	712.80
Asset Investigation & Recovery – Fees	06/03/14	490.05
Asset Investigation & Recovery – Fees	06/19/14	89.10
Operations & Asset Sales – Fees	04/22/14	89.10
Operations & Asset Sales – Fees	05/12/14	89.10
Claims & Distributions – Fees	05/15/14	44.55
Claims & Distributions – Fees	05/20/14	44.55
Pending Litigation – Fees	04/21/14	44.55
Pending Litigation – Fees	04/30/14	44.55
	Subtotal	\$4,411.35
	Total Fees	\$7,193.20

8. The original Fee Application sought an approval of \$443,187.00 in fees and \$30,950.51 in expenses. Based upon the foregoing, Allen Matkins now seeks approval for the following amounts:

- Fees \$435,993.80
- Costs \$ 29,761.47

