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11 Attorneys for Receiver
12 KRISTA L. FREITAG

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

16 SECURITIES AND EXCHANGE
COMMISSION,

17 Plaintiff,

18 v.

19 WORLD CAPITAL MARKET INC.;
WCM777 INC.; WCM777 LTD. d/b/a
20 WCM777 ENTERPRISES, INC.; and
MING XU a/k/a PHIL MING XU,

21 Defendants,

22 KINGDOM CAPITAL MARKET, LLC;
MANNA HOLDING GROUP, LLC;
23 MANNA SOURCE
INTERNATIONAL, INC.;
24 WCM RESOURCES, INC.; AEON
OPERATING, INC.; AND PMX JEWELS,
25 LTD. TOPACIFIC INC.; TO PACIFIC
INC.; VINCENT J. MESSINÀ; and
26 INTERNATIONAL MARKET
VENTURES,

27 Relief Defendants.
28

Case No. CV-14-2334-JFW-MRW

**NOTICE OF HEARING ON FEE
APPLICATIONS OF KRISTA L.
FREITAG, RECEIVER, AND HER
PROFESSIONALS, FOR
PAYMENT OF FEES AND
REIMBURSEMENT OF
EXPENSES**

Date: October 1, 2018
Time: 1:30 p.m.
Ctvm: 7A – 1st Street Courthouse
Judge: Hon. John F. Walter

1 **TO ALL INTERESTED PARTIES:**

2 **PLEASE TAKE NOTICE** that on October 1, 2018, at 1:30 p.m. in
3 Courtroom 7A of the above-entitled Court, located at 350 W. 1st Street, Los Angeles,
4 California 90012, the Court will consider the interim applications of Krista L. Freitag
5 ("Receiver"), Court-appointed permanent receiver for Defendants World Capital
6 Market Inc.; WCM777 Inc.; WCM777 Ltd. d/b/a WCM777 Enterprises, Inc.; and
7 Relief Defendants Kingdom Capital Market, LLC; Manna Holding Group, LLC;
8 Manna Source International, Inc.; WCM Resources, Inc.; ToPacific Inc.;
9 To Pacific Inc.; and their subsidiaries and affiliates ("Receivership Entities"), and her
10 general counsel, Allen Matkins Leck Gamble Mallory & Natsis LLP ("Allen
11 Matkins"), for approval and payment of fees and expenses ("Applications").

12 The Receiver seeks approval of \$2,279,285.83, which is composed of the
13 following:

- 14 • \$67,031.76 (\$64,910.70 in fees and \$2,121.06 in costs) incurred from
15 October 1, 2017 through June 30, 2018, but not yet paid,
- 16 • \$1,721,865.92 (\$1,609,302.18 in fees and \$112,563.74 of expenses)
17 paid to the Receiver on an interim basis pursuant to her thirteen interim
18 fee applications,¹
- 19 • \$402,325.55 in fees held back from the Receiver's thirteen interim fee
20 applications, and
- 21 • \$88,062.60 in projected fees and costs to complete the remaining tasks
22 laid out in the Motion to Conclude; these \$88,062.60 of projected fees
23 and costs are to be paid from the reserve funds established with the
24 Motion to Conclude filed concurrently herewith.

25 Allen Matkins seeks approval of \$2,021,291.50, which includes the following:
26

27 ¹ The Receiver's thirteen interim fee applications, along with bills reflecting the
28 work performed during each period can be found at Dkt. Nos. 216, 290, 342, 372,
409, 446, 452, 484, 527, 535-1, 542, 559, and 565 and are incorporated herein by
this reference.

- 1 • Approval and payment of fees and costs incurred during the nine-month
- 2 period from October 1, 2017, through June 30, 2018 ("Final Application
- 3 Period") of \$27,453.60 and \$91.33;
- 4 • Final approval of the firm's thirteen interim fee applications² and of the
- 5 \$1,590,926.58 (\$1,491,280.76 of fees and \$99,645.82 of expenses)
- 6 previously paid in connection with those applications;
- 7 • Approval and payment of fees held back from Allen Matkins' thirteen
- 8 interim fee applications in the total amount of \$372,819.99 ("Holdback
- 9 Amount"); and
- 10 • Approval of estimated fees and costs of up to \$30,000.00 for remaining
- 11 legal work to conclude the receivership, including work in July and
- 12 August 2018 on the Receiver's Motion to Conclude.

13 **Procedural Requirements:** If you oppose these Applications, you are
 14 required to file your written opposition with the Office of the Clerk, United States
 15 District Court, 312 North Spring Street, Los Angeles, California 90012 and serve the
 16 same on the undersigned not later than 21 days prior to the hearing.

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

19
 20 Dated: August 21, 2018

ALLEN MATKINS LECK GAMBLE
 MALLORY & NATSIS LLP

21
 22 By: /s/ David R. Zaro

23 DAVID R. ZARO
 Attorneys for Receiver
 KRISTA L. FREITAG

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 25
 26
 27 ² Allen Matkins' thirteen interim fee applications, along with bills reflecting the
 28 work performed during each period can be found at Dkt. Nos. 215, 291, 343, 373,
 410, 447, 453, 485, 528, 532, 543, 560, and 566 and are incorporated herein by
 this reference.