

MARSHALL BRUBACHER, #199100
mbrubacher@mohlaw.com
MUNDELL, ODLUM & HAWS, LLP
650 East Hospitality Lane, Suite 470
San Bernardino, CA 92408-3595
Phone: (909) 890-9500
Facsimile: (909) 890-8580

Attorneys for Objecting Limited Partner
Neal Bricker, M.D.

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

v.

**CHARLES P. COPELAND,
COPELAND WEALTH
MANAGEMENT, A FINANCIAL
ADVISORY CORPORATION; and
COPELAND WEALTH
MANAGEMENT, A REAL ESTATE
CORPORATION,**

Defendants.

CASE NO. 2:11-cv-08607-R-DTB

**OBJECTING LIMITED
PARTNER NEAL BRICKER
M.D.'S OBJECTIONS TO
EVIDENCE SUBMITTED BY
RECEIVER IN SUPPORT OF
RECEIVER'S MOTION FOR
ORDER: (1) APPROVING
RECEIVER'S DISTRIBUTION OF
ASSETS TO THE INVESTORS
OF COPELAND PROPERTIES 18,
L.P.; AND (2) AUTHORIZING
TERMINATION AND
CANCELLATION OF
COPELAND PROPERTIES 18,
L.P. AS AN ENTITY**

Date: September 16, 2013
Time: 10:00 a.m.
Dept: 8, 2nd Floor
The Honorable Manuel R. Real

Objecting Limited Partner Neal Bricker, M.D. ("Dr. Bricker") objects to
Paragraph 21 of the Declaration of Thomas Hebrank in Support of Motion for
Order: (1) Approving Receiver's Distribution of Assets to the Investors of

1 Copeland Properties 18, L.P.; and (2) Authorizing the Termination and
2 Cancellation of Copeland Properties 18, L.P. filed on August 16, 2013 (“the
3 Declaration”), page 6, line 22 through page 7, line 3, which reads as follows:
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5 “I am *informed and believe* that CP3 did not loan money to CP18, nor
6 did CP3 purchase the Property. I am *informed and believe* that CP3
7 acquired an interest in CP14, which was later transferred to CP18, and
8 then distributed to CP3’s partners when CP3 was terminated. I am
9 *informed and believe* that Bricker’s contribution was transferred to
10 Copeland Fixed Income Two, L.P.” (Emphasis added)
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14 Dr. Bricker objects to the above-referenced portion of the Declaration on the
15 following grounds: (1) hearsay, F.R. Evid. 802; (2) lacks foundation regarding
16 personal knowledge, F.R. Evid. 602; (3) violates the best evidence rule, F.R. Evid.
17 1002. Dr. Bricker hereby requests the Court to sustain the above objections and
18 strike the portion of the Declaration referred to above.
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21 Dated: August 26, 2013

MUNDELL, ODLUM & HAWS, LLP
MARSHALL BRUBACHER

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24 By: /s/ Marshall Brubacher
25 Marshall Brubacher
26 Attorneys for Objecting Limited
27 Partner Neal Bricker, M.D.
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