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8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA
10 WESTERN DIVISION – LOS ANGELES

11 SECURITIES AND EXCHANGE
12 COMMISSION,

13 Plaintiff,

14 v.

15 CHARLES P. COPELAND,
16 COPELAND WEALTH
MANAGEMENT, A FINANCIAL
17 ADVISORY CORPORATION,
AND COPELAND WEALTH
18 MANAGEMENT, A REAL
ESTATE CORPORATION,
19

20 Defendants.

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

**REPLY TO OBJECTION TO
MOTION FOR ORDER
AUTHORIZING THE
DESTRUCTION OF CERTAIN
DOCUMENTS IN THE
RECEIVER'S POSSESSION**

Date: June 3, 2013

Time: 10:00 a.m.

Ctrm: 8, 2nd Floor

Judge: Hon. Manuel L. Real

21
22 Mulvaney Barry Beatty Linn & Mayers, counsel for permanent
23 receiver Thomas Hebrank ("Receiver"), submits the following reply to the
24 objection filed by Bruce Taber, Maureen Taber and The Taber Family
25 Trust (the "Tabers") to the Receiver's Motion for Order Authorizing
26 Destruction of Certain Documents in Receiver's Possession (the
27 "Motion"). The Tabers are investors in Copeland Properties 8, L.P.
28 ("CP8") and Copeland Properties 18, L.P. ("CP18") and object to the

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1 destruction of CP8's documents and certain documents of Copeland
2 Wealth Management, a Financial Advisory Corporation ("CMW").

3 **CP8 Documents.** Among the documents Receiver wants to
4 destroy are those pertaining to CP8. The real property owned by CP8 is
5 the subject of a concurrent motion to abandon brought by the National
6 Credit Union Administration Board ("NCUA") as the liquidating agent for
7 Telesis Community Credit Union. Receiver already has made
8 arrangements for CP8's documents to be scanned and transferred to
9 disks, one of which will be provided to the Taber's counsel, with the
10 documents and/or another disk provided to counsel for NCUA. Receiver
11 agrees to an order granting the Motion subject to the Tabers' counsel
12 being provided with a disk of the documents.

13 **CWM Documents.** Also among the documents Receiver wants to
14 destroy are certain ones pertaining to CWM, comprised of vendor files
15 and bank statements no longer needed to discharge his duties.
16 Receiver agrees to an order granting the Motion subject to the Tabers'
17 counsel being provided with a 30 day period in which to inspect and copy
18 these CWM documents.

19 WHEREFORE, the Receiver requests that the Court issue an order
20 authorizing the destruction of documents subject to the Tabers' ability to
21 obtain copies of the CP8 and CWM documents.

22 Dated: May 17, 2013

MULVANEY BARRY BEATTY LINN &
MAYERS, LLP

25 By: /s/ John H. Stephens
26 Attorneys for Thomas C. Hebrank, Receiver

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28 HEBCO.100.483807.1