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 14 THOMAS C. HEBRANK

15 **UNITED STATES DISTRICT COURT**
 16 **SOUTHERN DISTRICT OF CALIFORNIA**

17 SECURITIES AND EXCHANGE
 18 COMMISSION,

19 Plaintiff,

20 v.

21 LOUIS V. SCHOOLER and FIRST
 22 FINANCIAL PLANNING
 23 CORPORATION d/b/a WESTERN
 24 FINANCIAL PLANNING
 25 CORPORATION,

26 Defendants.

Case No. 3:12-cv-02164-GPC-JMA

**DECLARATION OF THOMAS C.
 HEBRANK, RECEIVER, IN
 SUPPORT OF THIRD INTERIM FEE
 APPLICATIONS**

Date: August 16, 2013
 Time: 1:30 p.m.
 Ctrm.: 9D
 Judge: Hon. Gonzalo P. Curiel

**NO ORAL ARGUMENT UNLESS
 REQUESTED BY THE COURT**

1 I, Thomas C. Hebrank, declare as follows:

2 1. I am the Court-appointed receiver for First Financial Planning
3 Corporation d/b/a Western Financial Planning Corporation, and other specifically
4 listed entities (collectively, "Receivership Entities") in the above-captioned matter. I
5 have personal knowledge of the facts herein described, and if called to testify, I could
6 and would testify competently thereto. I make this declaration in support of the third
7 interim fee applications ("Third Fee Applications") of the Receiver and Allen
8 Matkins Leck Gamble Mallory & Natsis LLP ("Allen Matkins").

9 2. Pursuant to Part VII.C and G of the Temporary Restraining Order
10 ("TRO"), I retained Allen Matkins as my counsel. As discussed in the Third Fee
11 Application of Allen Matkins, I hired Allen Matkins because of the firm's substantial
12 experience and expertise in SEC receivership matters, as well as their competitive
13 rates in comparison to other firms with similar skill and expertise.

14 3. With the assistance of Allen Matkins, I have properly carried out my
15 Court-ordered duties and provided valuable services to the receivership estate in that
16 regard. All work by Allen Matkins has been performed at my direction. Allen
17 Matkins and I have worked diligently over the last five months without
18 compensation or reimbursement of expenses.

19 4. Detailed information, including descriptions of the activities undertaken,
20 is contained in the Third Fee Applications. I have reviewed the Third Fee
21 Applications and believe the fees and expenses requested in them are reasonable and
22 the services they reflect have been of substantial benefit to the receivership estate.

23 5. I therefore request the Court approve the fees and costs requested in
24 each application.

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1 I declare under penalty of perjury under the laws of the United States that the
2 foregoing is true and correct.

3 Executed this 4th day of June, 2013, at San Diego, California.
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THOMAS C. HEBRANK